

**To:** Culligan, Kevin[Culligan.Kevin@epa.gov]  
**Cc:** Lamason, Bill[Lamason.Bill@epa.gov]; Dalcher, Debra[dalcher.debra@epa.gov]  
**From:** Dalcher, Debra  
**Sent:** Mon 1/22/2018 7:08:15 PM  
**Subject:** FW: OIAI Revision Memo\_12.8.17.Wehrum Draft.docx  
[OIAI Revision Memo\\_12.8.17.Wehrum Draft.docx](#)  
[OIAI Revision Memo\\_12.8.17.Wehrum Draft.docx](#)

Kevin,

I believe the last sentence in the first paragraph came from Wehrum's edits following the OIAI briefing. Our version did not have that sentence in it.

I attached the email that includes the version Peter sent to Wehrum pre-briefing.

How would you like me to proceed? We could rewrite that sentence or have it reviewed by AQPD.

Thank you, Debra

**From:** Dalcher, Debra  
**Sent:** Friday, December 08, 2017 11:17 AM  
**To:** Tsirigotis, Peter <Tsirigotis.Peter@epa.gov>  
**Subject:** OIAI Revision Memo\_12.8.17.Wehrum Draft.docx  
**Importance:** High

Peter,

Here you go.

Please confirm receipt.

Thank you, Debra

**To:** Dalcher, Debra[dalcher.debra@epa.gov]; Culligan, Kevin[Culligan.Kevin@epa.gov]  
**From:** Lamason, Bill  
**Sent:** Tue 1/9/2018 4:42:05 PM  
**Subject:** FW: OIAI Discussion - Seeking further clarification re

Ex. 5 - Deliberative Process/Attorney Client

Peter weighed in. Will need to talk ASAP. Also need you and Kevin to join the call with Harlow tomorrow. B

**From:** Dalcher, Debra  
**Sent:** Tuesday, January 09, 2018 10:55 AM  
**To:** Jordan, Scott <Jordan.Scott@epa.gov>; Culligan, Kevin <Culligan.Kevin@epa.gov>; McLamb, Marguerite <McLamb.Marguerite@epa.gov>  
**Cc:** Lamason, Bill <Lamason.Bill@epa.gov>; Rodman, Sonja <Rodman.Sonja@epa.gov>  
**Subject:** RE: OIAI Discussion - Seeking further clarification re

Ex. 5 - Deliberative Process/Attorney Client

All,

Realizing we might need Peter and Sonja to weigh in...

Ex. 5 - Deliberative Process/Attorney Client

## Ex. 5 - Deliberative Process/Attorney Client

Terms Bill did use:

## Ex. 5 - Deliberative Process/Attorney Client

## Ex. 5 - Deliberative Process/Attorney Client

Debra

**From:** Jordan, Scott  
**Sent:** Tuesday, January 09, 2018 10:38 AM  
**To:** Dalcher, Debra <[dalcher.debra@epa.gov](mailto:dalcher.debra@epa.gov)>; Culligan, Kevin <[Culligan.Kevin@epa.gov](mailto:Culligan.Kevin@epa.gov)>; McLamb, Marguerite <[McLamb.Marguerite@epa.gov](mailto:McLamb.Marguerite@epa.gov)>  
**Cc:** Lamason, Bill <[Lamason.Bill@epa.gov](mailto:Lamason.Bill@epa.gov)>; Rodman, Sonja <[Rodman.Sonja@epa.gov](mailto:Rodman.Sonja@epa.gov)>  
**Subject:** OIAI Discussion - Seeking further clarification re "final agency action"

One more clarification on the instructions from Bill and Peter:

## **Ex. 5 - Deliberative Process/Attorney Client**

Scott Jordan

Air and Radiation Law Office

Office of General Counsel

202-564-7508

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**From:** Dalcher, Debra  
**Sent:** Monday, January 8, 2018 2:34 PM  
**To:** Jordan, Scott; Culligan, Kevin; McLamb, Marguerite  
**Cc:** Lamason, Bill; Dalcher, Debra



**Ex. 5 - Deliberative Process / Attorney Client**

**Subject:** RE: OIAI Discussion - Open Issues

**Ex. 5 - Deliberative Process/Attorney Client**

Thank you, Debra

-----Original Appointment-----

**From:** Dalcher, Debra

**Sent:** Friday, January 05, 2018 11:20 AM

**To:** Dalcher, Debra; Jordan, Scott; Culligan, Kevin

**Cc:** Lamason, Bill; McLamb, Marguerite

**Subject:** OIAI Discussion - Agenda will be Added / Memo w/SJ Edits Attached

**When:** Monday, January 08, 2018 11:00 AM-12:00 PM (UTC-05:00) Eastern Time (US & Canada).

**Where:** RTP-OAQPS-919-541-4332-SPPD/Phone-Line/RTP-OAQPS-BLDG-C

Agenda

Wehrum Version of Memo

- Discussion on the content of the memo.

## **Ex. 5 - Deliberative Process/Attorney Client**

- Supplemental Proposal

## **Ex. 5 - Deliberative Process/Attorney Client**



**To:** Culligan, Kevin[Culligan.Kevin@epa.gov]  
**Cc:** French, Chuck[French.Chuck@epa.gov]; Lamason, Bill[Lamason.Bill@epa.gov]  
**From:** Dalcher, Debra  
**Sent:** Thur 12/7/2017 4:07:06 PM  
**Subject:** RE: OIAI Options Pager 12\_06\_17\_BL-cf-kc-edits.docx

Thank you Kevin. Updated and sending to OGC for review.

Debra

**From:** Culligan, Kevin  
**Sent:** Thursday, December 07, 2017 10:31 AM  
**To:** Dalcher, Debra <dalcher.debra@epa.gov>  
**Cc:** French, Chuck <French.Chuck@epa.gov>; Lamason, Bill <Lamason.Bill@epa.gov>  
**Subject:** RE: OIAI Options Pager 12\_06\_17\_BL-cf-kc-edits.docx

## Ex. 5 - Deliberative Process

## Ex. 5 - Deliberative Process

**From:** Dalcher, Debra  
**Sent:** Thursday, December 07, 2017 10:19 AM  
**To:** Culligan, Kevin <Culligan.Kevin@epa.gov>  
**Cc:** French, Chuck <French.Chuck@epa.gov>; Lamason, Bill <Lamason.Bill@epa.gov>  
**Subject:** OIAI Options Pager 12\_06\_17\_BL-cf-kc-edits.docx  
**Importance:** High

Please review Kevin. If acceptable, I need to send to Scott Jordan for review this morning.

Thank you, Debra

**To:** Culligan, Kevin[Culligan.Kevin@epa.gov]  
**From:** Lamason, Bill  
**Sent:** Wed 11/8/2017 9:00:11 PM  
**Subject:** FW: Memo replacing OIAI with proposed 2007 interpretation\_11\_6\_17 MM (002).docx  
Memo replacing OIAI with proposed 2007 interpretation\_11\_8\_17 DD.docx

Kevin, Latest draft. I'll set a check in meeting for Monday and will try to schedule around your calendar.  
Bill

-----Original Message-----

From: Dalcher, Debra  
Sent: Wednesday, November 08, 2017 3:15 PM  
To: McLamb, Marguerite <McLamb.Marguerite@epa.gov>  
Cc: Lamason, Bill <Lamason.Bill@epa.gov>; Torres, Elineth <Torres.Elineth@epa.gov>; Dalcher, Debra <dalcher.debra@epa.gov>  
Subject: RE: Memo replacing OIAI with proposed 2007 interpretation\_11\_6\_17 MM (002).docx

Marguerite,

Thank you for the update.

## Ex. 5 - Deliberative Process

# Ex. 5 - Deliberative Process

Thank you, Debra

-----Original Message-----

From: McLamb, Marguerite  
Sent: Wednesday, November 08, 2017 3:04 PM  
To: Dalcher, Debra <dalcher.debra@epa.gov>  
Cc: Lamason, Bill <Lamason.Bill@epa.gov>; Torres, Elineth <Torres.Elineth@epa.gov>  
Subject: RE: Memo replacing OIAI with proposed 2007 interpretation\_11\_6\_17 MM (002).docx

Hi, all,

# Ex. 5 - Deliberative Process

I'm glad to discuss this more if you'd like; I'll be in the office tomorrow morning.

Best,  
Marguerite

\*\*\*\*\*

Marguerite E. McLamb  
Policy Advisor  
Sector Policies and Programs Division

Office of Air Quality Planning & Standards U.S. Environmental Protection Agency Research Triangle  
Park, NC 27711  
Phone: (919) 541-7858  
Fax: (919) 541-4991  
mclamb.marguerite@epa.gov

---

From: Dalcher, Debra  
Sent: Wednesday, November 8, 2017 2:51 PM  
To: McLamb, Marguerite  
Cc: Lamason, Bill; Torres, Elineth  
Subject: RE: Memo replacing OIAI with proposed 2007 interpretation\_11\_6\_17 MM (002).docx

Marguerite,

## Ex. 5 - Deliberative Process

Thank you, Debra

-----Original Message-----

From: McLamb, Marguerite  
Sent: Wednesday, November 08, 2017 10:27 AM  
To: Dalcher, Debra <dalcher.debra@epa.gov>  
Cc: Lamason, Bill <Lamason.Bill@epa.gov>; Torres, Elineth <Torres.Elineth@epa.gov>  
Subject: RE: Memo replacing OIAI with proposed 2007 interpretation\_11\_6\_17 MM (002).docx

Thank you, Debra.

\*\*\*\*\*

Marguerite E. McLamb  
Policy Advisor  
Sector Policies and Programs Division  
Office of Air Quality Planning & Standards U.S. Environmental Protection Agency Research Triangle  
Park, NC 27711  
Phone: (919) 541-7858  
Fax: (919) 541-4991  
mclamb.marguerite@epa.gov

---

From: Dalcher, Debra  
Sent: Wednesday, November 8, 2017 10:18 AM  
To: McLamb, Marguerite  
Cc: Lamason, Bill; Torres, Elineth; Dalcher, Debra  
Subject: Memo replacing OIAI with proposed 2007 interpretation\_11\_6\_17 MM (002).docx

Thank you Marguerite.

Please let me know if she has any suggestions/thoughts.

Debra

**To:** Harlow, David[harlow.david@epa.gov]; Culligan, Kevin[Culligan.Kevin@epa.gov]  
**Cc:** Dalcher, Debra[dalcher.debra@epa.gov]; Lewis, Josh[Lewis.Josh@epa.gov]; Koerber, Mike[Koerber.Mike@epa.gov]  
**From:** Lamason, Bill  
**Sent:** Thur 1/25/2018 7:29:38 PM  
**Subject:** RE: OIAI.Reclassification of Major Sources as Area Sources Under Section 112 Draft\_01 25 2018-Final OGC Comments.1.25.18\_PSG.docx

David,

Thanks! Great news! I'll pass along Josh's suggestion to the folks handling the cleanup and are almost done.

We were planning to send the memo to the OAQPS-DC office via Mary Henigin and she can help Josh however needed. We will hold the FR in RTP for Peter's signature after your clearance and Bill signs the memo. I'm copying Mike Koerber who coordinates with Mary on these actions for us and determine how best to move the memo fastest.

Thanks again!

Bill L.

**From:** Harlow, David  
**Sent:** Thursday, January 25, 2018 2:19 PM  
**To:** Lamason, Bill <Lamason.Bill@epa.gov>; Culligan, Kevin <Culligan.Kevin@epa.gov>  
**Cc:** Dalcher, Debra <dalcher.debra@epa.gov>; Lewis, Josh <Lewis.Josh@epa.gov>  
**Subject:** RE: OIAI.Reclassification of Major Sources as Area Sources Under Section 112 Draft\_01 25 2018-Final OGC Comments.1.25.18\_PSG.docx

Bill Wehrum has approved all the revisions/edits that we've been discussing. So please do finalize the memorandum for Bill's signature.



I'm not sure what is the best way to proceed in terms of getting the final version physically up here, but the simplest approach would seem to be that you send the final, to-be-signed version as an attachment in an email to Josh. I'll leave it up to you two to "discuss among yourselves," as it were.

Meanwhile, I'll review the *Federal Register* notice and then get back to you with, presumably, approval to finalize as well.

Thank you.

**David S. Harlow**  
**Senior Counsel**

**Immediate Office of the Assistant Administrator**  
**Office of Air and Radiation, USEPA**  
**WJC-N Room 5409K**

**1200 Pennsylvania Avenue NW**  
**Washington, DC 20460**  
**202-564-1233**

[Harlow.David@epa.gov](mailto:Harlow.David@epa.gov)

**To:** Lamason, Bill[Lamason.Bill@epa.gov]; Culligan, Kevin[Culligan.Kevin@epa.gov]  
**Cc:** Dalcher, Debra[dalcher.debra@epa.gov]; Lewis, Josh[Lewis.Josh@epa.gov]  
**From:** Harlow, David  
**Sent:** Thur 1/25/2018 7:19:29 PM  
**Subject:** RE: OIAI.Reclassification of Major Sources as Area Sources Under Section 112 Draft\_01 25 2018-Final OGC Comments.1.25.18\_PSG.docx

Bill Wehrum has approved all the revisions/edits that we've been discussing. So please do finalize the memorandum for Bill's signature.

I'm not sure what is the best way to proceed in terms of getting the final version physically up here, but the simplest approach would seem to be that you send the final, to-be-signed version as an attachment in an email to Josh. I'll leave it up to you two to "discuss among yourselves," as it were.

Meanwhile, I'll review the *Federal Register* notice and then get back to you with, presumably, approval to finalize as well.

Thank you.

**David S. Harlow**  
**Senior Counsel**

**Immediate Office of the Assistant Administrator**  
**Office of Air and Radiation, USEPA**  
**WJC-N Room 5409K**

**1200 Pennsylvania Avenue NW**  
**Washington, DC 20460**  
**202-564-1233**

[Harlow.David@epa.gov](mailto:Harlow.David@epa.gov)

**From:** Lamason, Bill

**Sent:** Thursday, January 25, 2018 2:00 PM  
**To:** Harlow, David <harlow.david@epa.gov>; Culligan, Kevin <Culligan.Kevin@epa.gov>  
**Cc:** Dalcher, Debra <dalcher.debra@epa.gov>  
**Subject:** RE: OIAI.Reclassification of Major Sources as Area Sources Under Section 112  
Draft\_01 25 2018-Final OGC Comments.1.25.18\_PSG.docx

David, Thanks! OAR will be on stationary so placing in the header is redundant. We will begin cleaning up the memo. Will wait to hear from you on clearance of memo and notice. Bill

**From:** Harlow, David  
**Sent:** Thursday, January 25, 2018 1:57 PM  
**To:** Lamason, Bill <Lamason.Bill@epa.gov>; Culligan, Kevin <Culligan.Kevin@epa.gov>  
**Cc:** Dalcher, Debra <dalcher.debra@epa.gov>  
**Subject:** RE: OIAI.Reclassification of Major Sources as Area Sources Under Section 112  
Draft\_01 25 2018-Final OGC Comments.1.25.18\_PSG.docx

All,

The minor revisions/edits reflected in this draft are all fine with me. (I assume that there is some institutional "stylistic conformity" reason for deleting the reference in the "From:" to Bill's being the AA for the "~~Office of Air and Radiation.~~") So, please do go forward to implement.

Bill, per something I said in my prior email, Josh Lewis here has helpfully shifted Bill Wehrum's next meeting from 2:00 p.m. to 2:15 p.m., so Mandy and I will have an express opportunity to get a "final final" signoff from him on the memo as revised.

Thank you all for your efforts in seeing this along.

Stay tuned . . . .

**David S. Harlow**  
**Senior Counsel**

**Immediate Office of the Assistant Administrator**  
**Office of Air and Radiation, USEPA**  
**WJC-N Room 5409K**

**1200 Pennsylvania Avenue NW**  
**Washington, DC 20460**  
**202-564-1233**

[Harlow.David@epa.gov](mailto:Harlow.David@epa.gov)

**From:** Lamason, Bill  
**Sent:** Thursday, January 25, 2018 1:41 PM  
**To:** Harlow, David <[harlow.david@epa.gov](mailto:harlow.david@epa.gov)>; Culligan, Kevin <[Culligan.Kevin@epa.gov](mailto:Culligan.Kevin@epa.gov)>  
**Cc:** Dalcher, Debra <[dalcher.debra@epa.gov](mailto:dalcher.debra@epa.gov)>  
**Subject:** OIAI.Reclassification of Major Sources as Area Sources Under Section 112 Draft\_01  
25 2018-Final OGC Comments.1.25.18\_PSG.docx

David, These are the final edits. Kevin will discuss the yellow highlighted text with you. If you do not connect, please call me.

We await OAR approval. Thanks! Bill

**To:** Torres, Elineth[Torres.Elineth@epa.gov]  
**Cc:** Rodman, Sonja[Rodman.Sonja@epa.gov]; Lamason, Bill[Lamason.Bill@epa.gov]; Dalcher, Debra[dalcher.debra@epa.gov]; McLamb, Marguerite[McLamb.Marguerite@epa.gov]; French, Chuck[French.Chuck@epa.gov]; Culligan, Kevin[Culligan.Kevin@epa.gov]  
**From:** Vetter, Rick  
**Sent:** Mon 10/23/2017 2:26:42 PM  
**Subject:** RE: Updated OIAI options document for OGC review

Thanks, Elineth. I don't know what Sonja's schedule looks like, but I'll do my best to get something to her by COB tomorrow. That should give us plenty of time to work through any issues that might come up during our review.

Rick

Richard H. Vetter

Richard H. Vetter

Attorney Advisor

Air & Radiation Law Office

Office of General Counsel

[vetter.rick@epa.gov](mailto:vetter.rick@epa.gov)

919-541-2127

**From:** Torres, Elineth  
**Sent:** Monday, October 23, 2017 9:37 AM  
**To:** Vetter, Rick <Vetter.Rick@epa.gov>  
**Cc:** Rodman, Sonja <Rodman.Sonja@epa.gov>; Lamason, Bill <Lamason.Bill@epa.gov>; Dalcher, Debra <dalcher.debra@epa.gov>; McLamb, Marguerite <McLamb.Marguerite@epa.gov>; French, Chuck <French.Chuck@epa.gov>; Culligan, Kevin <Culligan.Kevin@epa.gov>  
**Subject:** Updated OIAI options document for OGC review

Rick,

Attached is the updated OIAI options document we had been working on. This version reflects the latest direction we got from Peter. Peter wants us to get this version reviewed and cleared by OGC before proceeding to share it with OAQPS/OAR IO management. Peter wants to make sure OGC is comfortable with the approaches/options presented in the document.

Per our conversation over the phone, you will review the document first and then have Sonja review it. Do you think it is possible to get OGC input by the end of this week (10/27)? Feel free to let me know if you have questions.

Thank You!

Elineth Torres

OAQPS

919-541-4347

**To:** French, Chuck[French.Chuck@epa.gov]; Lamason, Bill[Lamason.Bill@epa.gov]  
**Cc:** Dalcher, Debra[dalcher.debra@epa.gov]; Culligan, Kevin[Culligan.Kevin@epa.gov]; McLamb, Marguerite[McLamb.Marguerite@epa.gov]  
**From:** Torres, Elineth  
**Sent:** Mon 10/23/2017 1:17:05 PM  
**Subject:** RE: OIAI updated options paper

Thank You!

I will clean the document and send it to OGC for their review.

Elineth Torres

OAQPS

919-541-4347

**From:** French, Chuck  
**Sent:** Friday, October 20, 2017 11:13 AM  
**To:** Torres, Elineth <Torres.Elineth@epa.gov>; Lamason, Bill <Lamason.Bill@epa.gov>  
**Cc:** Dalcher, Debra <dalcher.debra@epa.gov>; Culligan, Kevin <Culligan.Kevin@epa.gov>; McLamb, Marguerite <McLamb.Marguerite@epa.gov>  
**Subject:** RE: OIAI updated options paper

Hi Elineth,

Sorry for the delay! Thanks for revising the paper! Anyway, attached are my suggested edits (as shown in attached). Many of these edits are mainly to shorten the paper some. Other edits are for clarification, etc....

Let me know if you have questions, concerns, etc...

Thanks.

Chuck

**From:** Torres, Elineth

**Sent:** Tuesday, October 17, 2017 10:58 AM

**To:** Lamason, Bill <[Lamason.Bill@epa.gov](mailto:Lamason.Bill@epa.gov)>; French, Chuck <[French.Chuck@epa.gov](mailto:French.Chuck@epa.gov)>

**Cc:** Dalcher, Debra <[dalcher.debra@epa.gov](mailto:dalcher.debra@epa.gov)>; Culligan, Kevin <[Culligan.Kevin@epa.gov](mailto:Culligan.Kevin@epa.gov)>; McLamb, Marguerite <[McLamb.Marguerite@epa.gov](mailto:McLamb.Marguerite@epa.gov)>

**Subject:** OIAI updated options paper

Bill and Chuck,

Can you skim the attached version of the OIAI options paper and let me know if you have any edits/comments. In this version we have tried to incorporate the feedback we got from Peter last week. I will share the paper with OGC next but wanted to give you a chance to weigh in at this time since you were present at the meeting with Peter. Would it be possible for you to provide any feedback by noon Thursday, Oct 19?

Thanks,

Elineth Torres

OAQPS

919-541-4347



**To:** Jordan, Scott[Jordan.Scott@epa.gov]; Dalcher, Debra[dalcher.debra@epa.gov]; Culligan, Kevin[Culligan.Kevin@epa.gov]; Lamason, Bill[Lamason.Bill@epa.gov]; Rodman, Sonja[Rodman.Sonja@epa.gov]  
**From:** Harlow, David  
**Sent:** Wed 1/24/2018 3:45:49 PM  
**Subject:** RE: OIAI - Draft Final Paragraph for Memo

Thank you. The revised draft that I will be circulating shortly will contain this language.

**David S. Harlow**  
**Senior Counsel**

**Immediate Office of the Assistant Administrator**  
**Office of Air and Radiation, USEPA**  
**WJC-N Room 5409K**

**1200 Pennsylvania Avenue NW**  
**Washington, DC 20460**  
**202-564-1233**

[Harlow.David@epa.gov](mailto:Harlow.David@epa.gov)

**From:** Jordan, Scott  
**Sent:** Wednesday, January 24, 2018 10:29 AM  
**To:** Dalcher, Debra <dalcher.debra@epa.gov>; Harlow, David <harlow.david@epa.gov>; Culligan, Kevin <Culligan.Kevin@epa.gov>; Lamason, Bill <Lamason.Bill@epa.gov>; Rodman, Sonja <Rodman.Sonja@epa.gov>  
**Subject:** OIAI - Draft Final Paragraph for Memo

Debra and All –

**Ex. 5 - Attorney Client**

# Ex. 5 - Attorney Client

Scott Jordan

Air and Radiation Law Office

Office of General Counsel

202-564-7508

**From:** Dalcher, Debra

**Sent:** Wednesday, January 24, 2018 10:08 AM

**To:** Harlow, David <[harlow.david@epa.gov](mailto:harlow.david@epa.gov)>; Jordan, Scott <[Jordan.Scott@epa.gov](mailto:Jordan.Scott@epa.gov)>; Culligan, Kevin <[Culligan.Kevin@epa.gov](mailto:Culligan.Kevin@epa.gov)>; Lamason, Bill <[Lamason.Bill@epa.gov](mailto:Lamason.Bill@epa.gov)>

**Cc:** Dalcher, Debra <[dalcher.debra@epa.gov](mailto:dalcher.debra@epa.gov)>

**Subject:** FRN Notice of Memorandum Availability 1\_23\_18\_JE DD.docx

David,

This notice will need to be updated to reflect any changes you/Bill/others make to the memo.

We will need to know who is signing both the memo and the notice to prepare the blue folder.

Thank you, Debra

**To:** Jordan, Scott[Jordan.Scott@epa.gov]  
**Cc:** Lamason, Bill[Lamason.Bill@epa.gov]; Culligan, Kevin[Culligan.Kevin@epa.gov]; Rodman, Sonja[Rodman.Sonja@epa.gov]  
**From:** Dalcher, Debra  
**Sent:** Wed 1/24/2018 2:05:23 PM  
**Subject:** RE: OIAO - Possible revision

**Ex. 5 - Attorney Client /Deliberative Process**

Scott, can I share this with David prior to the discussion today? It would be helpful for him to be looking at this language during the discussion at 09:30 given we all have it.

Thanks, Debra

**From:** Jordan, Scott  
**Sent:** Wednesday, January 24, 2018 9:01 AM  
**To:** Dalcher, Debra <dalcher.debra@epa.gov>  
**Cc:** Lamason, Bill <Lamason.Bill@epa.gov>; Culligan, Kevin <Culligan.Kevin@epa.gov>; Rodman, Sonja <Rodman.Sonja@epa.gov>  
**Subject:** OIAO - Possible revision

**Ex. 5 - Attorney Client /Deliberative Process****Ex. 5 - Attorney Client /Deliberative Process**

Scott Jordan

Air and Radiation Law Office

Office of General Counsel

202-564-7508

**From:** Dalcher, Debra  
**Sent:** Monday, January 22, 2018 3:56 PM  
**To:** Jordan, Scott <[Jordan.Scott@epa.gov](mailto:Jordan.Scott@epa.gov)>  
**Cc:** Dalcher, Debra <[dalcher.debra@epa.gov](mailto:dalcher.debra@epa.gov)>; Lamason, Bill <[Lamason.Bill@epa.gov](mailto:Lamason.Bill@epa.gov)>; Culligan, Kevin <[Culligan.Kevin@epa.gov](mailto:Culligan.Kevin@epa.gov)>; Rodman, Sonja <[Rodman.Sonja@epa.gov](mailto:Rodman.Sonja@epa.gov)>  
**Subject:** RE: Reclassification of Major Sources as Area Sources Under Section 112\_Draft\_1 22 18\_1pm.docx

Scott,

## Ex. 5 - Attorney Client /Deliberative Process

That is the last of Kevin's comments. None from Penny yet.

Thank you, Debra

**From:** Dalcher, Debra  
**Sent:** Monday, January 22, 2018 3:02 PM  
**To:** Jordan, Scott <[Jordan.Scott@epa.gov](mailto:Jordan.Scott@epa.gov)>  
**Cc:** Dalcher, Debra <[dalcher.debra@epa.gov](mailto:dalcher.debra@epa.gov)>  
**Subject:** Reclassification of Major Sources as Area Sources Under Section 112\_Draft\_1 22

18\_1pm.docx

Scott, see attached.

## **Ex. 5 - Attorney Client /Deliberative Process**

Debra

**To:** Rodman, Sonja[Rodman.Sonja@epa.gov]; Dalcher, Debra[dalcher.debra@epa.gov]  
**Cc:** McLamb, Marguerite[McLamb.Marguerite@epa.gov]; Lamason, Bill[Lamason.Bill@epa.gov]  
**From:** Vetter, Rick  
**Sent:** Mon 11/20/2017 7:18:03 PM  
**Subject:** RE: Current Version of Revision Memo

Debra,

I have several more calls today and am only working until noon tomorrow. After that, I'll be out until 11/28. Just send it whenever you are ready. I've been working on the discussion Sonja is looking for and will need to plug that in at some point. I hope everyone has a wonderful Thanksgiving. Safe travels if you must.

Rick

Richard H. Vetter

Richard H. Vetter

Attorney Advisor

Air & Radiation Law Office

Office of General Counsel

[vetter.rick@epa.gov](mailto:vetter.rick@epa.gov)

919-541-2127

**From:** Rodman, Sonja  
**Sent:** Monday, November 20, 2017 1:55 PM  
**To:** Dalcher, Debra <dalcher.debra@epa.gov>  
**Cc:** Vetter, Rick <Vetter.Rick@epa.gov>; McLamb, Marguerite <McLamb.Marguerite@epa.gov>; Lamason, Bill <Lamason.Bill@epa.gov>  
**Subject:** Re: Current Version of Revision Memo

Thanks! I'd like to read after Rick so that I get the benefit of his input also.

Sent from my iPhone

On Nov 20, 2017, at 1:51 PM, Dalcher, Debra <[dalcher.debra@epa.gov](mailto:dalcher.debra@epa.gov)> wrote:

<image002.gif>

Hi Sonja,

We are checking with the “groups” on a couple of items, believe we have addressed most if not all of your initial comments, and are working to re-organize the memo based on your comments below. We should be sending a new version your way in the next day or so.

Thank you, Debra

**From:** Rodman, Sonja

**Sent:** Monday, November 20, 2017 9:20 AM

**To:** Lamason, Bill <[Lamason.Bill@epa.gov](mailto:Lamason.Bill@epa.gov)>; Dalcher, Debra <[dalcher.debra@epa.gov](mailto:dalcher.debra@epa.gov)>

**Cc:** Torres, Elineth <[Torres.Elineth@epa.gov](mailto:Torres.Elineth@epa.gov)>; Vetter, Rick <[Vetter.Rick@epa.gov](mailto:Vetter.Rick@epa.gov)>;

McLamb, Marguerite <[McLamb.Marguerite@epa.gov](mailto:McLamb.Marguerite@epa.gov)>

**Subject:** RE: Current Version of Revision Memo

## Ex. 5 - Attorney Client

Sonja L. Rodman

Air Toxics, Consumer Protection and Indoor Air Practice Group

(202) 564-4079

*CONFIDENTIALITY NOTICE: This message may contain sensitive, privileged information covered by the deliberative process, attorney-client and/or attorney work product privileges. Do not release this message under FOIA without appropriate review. If you are not the intended recipient, or the employee or agent responsible to deliver it to the intended recipient, please contact the sender and delete all copies.*

**From:** Lamason, Bill  
**Sent:** Friday, November 17, 2017 2:44 PM  
**To:** Rodman, Sonja <[Rodman.Sonja@epa.gov](mailto:Rodman.Sonja@epa.gov)>; Dalcher, Debra <[dalcher.debra@epa.gov](mailto:dalcher.debra@epa.gov)>  
**Cc:** Torres, Elineth <[Torres.Elineth@epa.gov](mailto:Torres.Elineth@epa.gov)>; Vetter, Rick <[Vetter.Rick@epa.gov](mailto:Vetter.Rick@epa.gov)>; McLamb, Marguerite <[McLamb.Marguerite@epa.gov](mailto:McLamb.Marguerite@epa.gov)>  
**Subject:** RE: Current Version of Revision Memo

Sonja,

Sonja,

**Ex. 5 - Attorney Client**

**Ex. 5 - Attorney Client**

Thanks!



Bill

**From:** Rodman, Sonja  
**Sent:** Friday, November 17, 2017 12:17 PM  
**To:** Lamason, Bill <[Lamason.Bill@epa.gov](mailto:Lamason.Bill@epa.gov)>; Dalcher, Debra <[dalcher.debra@epa.gov](mailto:dalcher.debra@epa.gov)>  
**Cc:** Torres, Elineth <[Torres.Elineth@epa.gov](mailto:Torres.Elineth@epa.gov)>; Vetter, Rick <[Vetter.Rick@epa.gov](mailto:Vetter.Rick@epa.gov)>; McLamb, Marguerite <[McLamb.Marguerite@epa.gov](mailto:McLamb.Marguerite@epa.gov)>  
**Subject:** RE: Current Version of Revision Memo

## Ex. 5 - Attorney Client

Sonja L. Rodman

Air Toxics, Consumer Protection and Indoor Air Practice Group

(202) 564-4079

*CONFIDENTIALITY NOTICE: This message may contain sensitive, privileged information covered by the deliberative process, attorney-client and/or attorney work product privileges. Do not release this message under FOIA without appropriate review. If you are not the intended recipient, or the employee or agent responsible to deliver it to the intended recipient, please contact the sender and delete all copies.*

**From:** Lamason, Bill  
**Sent:** Thursday, November 16, 2017 4:53 PM  
**To:** Dalcher, Debra <[dalcher.debra@epa.gov](mailto:dalcher.debra@epa.gov)>; Rodman, Sonja <[Rodman.Sonja@epa.gov](mailto:Rodman.Sonja@epa.gov)>  
**Cc:** Torres, Elineth <[Torres.Elineth@epa.gov](mailto:Torres.Elineth@epa.gov)>; Vetter, Rick <[Vetter.Rick@epa.gov](mailto:Vetter.Rick@epa.gov)>;

McLamb, Marguerite <[McLamb.Marguerite@epa.gov](mailto:McLamb.Marguerite@epa.gov)>  
**Subject:** RE: Current Version of Revision Memo

Debra and Sonja,

## Ex. 5 - Attorney Client

Bill

**From:** Dalcher, Debra  
**Sent:** Thursday, November 16, 2017 4:47 PM  
**To:** Rodman, Sonja <[Rodman.Sonja@epa.gov](mailto:Rodman.Sonja@epa.gov)>; Lamason, Bill <[Lamason.Bill@epa.gov](mailto:Lamason.Bill@epa.gov)>  
**Cc:** Torres, Elineth <[Torres.Elineth@epa.gov](mailto:Torres.Elineth@epa.gov)>; Vetter, Rick <[Vetter.Rick@epa.gov](mailto:Vetter.Rick@epa.gov)>;  
McLamb, Marguerite <[McLamb.Marguerite@epa.gov](mailto:McLamb.Marguerite@epa.gov)>  
**Subject:** RE: Current Version of Revision Memo

Hi Sonja,

I have addressed some of your comments, but not all. I am out of time for today.

I am attaching my working version for you to work with tomorrow.

## Ex. 5 - Attorney Client

Tomorrow is my CDO.

Thank you! Debra

**From:** Rodman, Sonja  
**Sent:** Thursday, November 16, 2017 2:38 PM  
**To:** Dalcher, Debra <[dalcher.debra@epa.gov](mailto:dalcher.debra@epa.gov)>; Vetter, Rick <[Vetter.Rick@epa.gov](mailto:Vetter.Rick@epa.gov)>; McLamb, Marguerite <[McLamb.Marguerite@epa.gov](mailto:McLamb.Marguerite@epa.gov)>  
**Cc:** Torres, Elineth <[Torres.Elineth@epa.gov](mailto:Torres.Elineth@epa.gov)>; Lamason, Bill <[Lamason.Bill@epa.gov](mailto:Lamason.Bill@epa.gov)>  
**Subject:** RE: Current Version of Revision Memo

## Ex. 5 - Attorney Client

Sonja L. Rodman

Air Toxics, Consumer Protection and Indoor Air Practice Group

(202) 564-4079

*CONFIDENTIALITY NOTICE: This message may contain sensitive, privileged information covered by the deliberative process, attorney-client and/or attorney work product privileges. Do not release this message under FOIA without appropriate review. If you are not the intended recipient, or the employee or agent responsible to deliver it to the intended recipient, please contact the sender and delete all copies.*

**From:** Dalcher, Debra  
**Sent:** Thursday, November 16, 2017 2:27 PM  
**To:** Vetter, Rick <[Vetter.Rick@epa.gov](mailto:Vetter.Rick@epa.gov)>; McLamb, Marguerite

<McLamb.Marguerite@epa.gov>; Rodman, Sonja <Rodman.Sonja@epa.gov>  
**Cc:** Torres, Elineth <Torres.Elineth@epa.gov>; Lamason, Bill <Lamason.Bill@epa.gov>  
**Subject:** RE: Current Version of Revision Memo

Rick,

**Ex. 5 - Attorney Client**

**Ex. 5 - Attorney Client**

Bill will send out a revised version of this memo at the end of the day. I am updating now.

Thank you everyone, Debra

**From:** Vetter, Rick  
**Sent:** Thursday, November 16, 2017 2:15 PM  
**To:** Dalcher, Debra <dalcher.debra@epa.gov>; McLamb, Marguerite  
<McLamb.Marguerite@epa.gov>; Lamason, Bill <Lamason.Bill@epa.gov>; Rodman, Sonja  
<Rodman.Sonja@epa.gov>  
**Cc:** Torres, Elineth <Torres.Elineth@epa.gov>  
**Subject:** RE: Current Version of Revision Memo

**Ex. 5 - Attorney Client**

Rick

Richard H. Vetter

Richard H. Vetter

Attorney Advisor

Air & Radiation Law Office

Office of General Counsel

[vetter.rick@epa.gov](mailto:vetter.rick@epa.gov)

919-541-2127

**From:** Dalcher, Debra

**Sent:** Thursday, November 16, 2017 1:40 PM

**To:** Vetter, Rick <[Vetter.Rick@epa.gov](mailto:Vetter.Rick@epa.gov)>; McLamb, Marguerite  
<[McLamb.Marguerite@epa.gov](mailto:McLamb.Marguerite@epa.gov)>; Lamason, Bill <[Lamason.Bill@epa.gov](mailto:Lamason.Bill@epa.gov)>; Rodman, Sonja  
<[Rodman.Sonja@epa.gov](mailto:Rodman.Sonja@epa.gov)>

**Cc:** Torres, Elineth <[Torres.Elineth@epa.gov](mailto:Torres.Elineth@epa.gov)>

**Subject:** RE: Current Version of Revision Memo

Rick,

This is the current version.

Thank you, Debra

**From:** Vetter, Rick

**Sent:** Thursday, November 16, 2017 1:30 PM

**To:** Dalcher, Debra <[dalcher.debra@epa.gov](mailto:dalcher.debra@epa.gov)>; McLamb, Marguerite  
<[McLamb.Marguerite@epa.gov](mailto:McLamb.Marguerite@epa.gov)>; Lamason, Bill <[Lamason.Bill@epa.gov](mailto:Lamason.Bill@epa.gov)>; Rodman, Sonja  
<[Rodman.Sonja@epa.gov](mailto:Rodman.Sonja@epa.gov)>

**Cc:** Torres, Elineth <[Torres.Elineth@epa.gov](mailto:Torres.Elineth@epa.gov)>

**Subject:** RE: Current Version of Revision Memo

Debra,

## Ex. 5 - Attorney Client

Rick

Richard H. Vetter

Richard H. Vetter

Attorney Advisor

Air & Radiation Law Office

Office of General Counsel

[vetter.rick@epa.gov](mailto:vetter.rick@epa.gov)

919-541-2127

**From:** Dalcher, Debra

**Sent:** Monday, November 13, 2017 4:09 PM

**To:** McLamb, Marguerite <[McLamb.Marguerite@epa.gov](mailto:McLamb.Marguerite@epa.gov)>; Vetter, Rick  
<[Vetter.Rick@epa.gov](mailto:Vetter.Rick@epa.gov)>; Lamason, Bill <[Lamason.Bill@epa.gov](mailto:Lamason.Bill@epa.gov)>; Rodman, Sonja  
<[Rodman.Sonja@epa.gov](mailto:Rodman.Sonja@epa.gov)>

**Cc:** Dalcher, Debra <[dalcher.debra@epa.gov](mailto:dalcher.debra@epa.gov)>; Torres, Elineth <[Torres.Elineth@epa.gov](mailto:Torres.Elineth@epa.gov)>

**Subject:** Current Version of Revision Memo

**Importance:** High

As promised during our meeting this morning I am sending out the current working draft of the memo for your review/any comments.

Elineth and I will begin work on this again tomorrow. We would appreciate any feedback you might have on the attached.

Thank you, Debra

Debra S. Dalcher

U.S. EPA

Policy and Strategies Group

Sector Policies and Programs Division, OAQPS

109 T.W. Alexander Drive

Research Triangle Park, NC 27711

Phone: 919-541-2443

**To:** Dalcher, Debra[dalcher.debra@epa.gov]  
**Cc:** Lamason, Bill[Lamason.Bill@epa.gov]; Culligan, Kevin[Culligan.Kevin@epa.gov]; Rodman, Sonja[Rodman.Sonja@epa.gov]  
**From:** Jordan, Scott  
**Sent:** Wed 1/24/2018 2:00:56 PM  
**Subject:** OIAO - Possible revision to **Ex. 5 - Attorney Client**  
Comment National Resources Defence Council (NRDC) May 4 2007 (1).pdf

In advance of our discussion today, here are possible edits to the sentence that Kevin has flagged and some of the other text in that paragraph:

## Ex. 5 - Attorney Client

Scott Jordan

Air and Radiation Law Office

Office of General Counsel

202-564-7508

**From:** Dalcher, Debra  
**Sent:** Monday, January 22, 2018 3:56 PM  
**To:** Jordan, Scott <Jordan.Scott@epa.gov>  
**Cc:** Dalcher, Debra <dalcher.debra@epa.gov>; Lamason, Bill <Lamason.Bill@epa.gov>; Culligan, Kevin <Culligan.Kevin@epa.gov>; Rodman, Sonja <Rodman.Sonja@epa.gov>  
**Subject:** RE: Reclassification of Major Sources as Area Sources Under Section 112\_Draft\_1 22 18\_1pm.docx

Scott,



# Ex. 5 - Attorney Client

That is the last of Kevin's comments. None from Penny yet.

Thank you, Debra

**From:** Dalcher, Debra

**Sent:** Monday, January 22, 2018 3:02 PM

**To:** Jordan, Scott <[Jordan.Scott@epa.gov](mailto:Jordan.Scott@epa.gov)>

**Cc:** Dalcher, Debra <[dalcher.debra@epa.gov](mailto:dalcher.debra@epa.gov)>

**Subject:** Reclassification of Major Sources as Area Sources Under Section 112\_Draft\_1 22  
18\_1pm.docx

Scott, see attached.

# Ex. 5 - Attorney Client

## Ex. 5 - Attorney Client

**Ex. 5 - Attorney Client**

Debra

**To:** Culligan, Kevin[Culligan.Kevin@epa.gov]  
**Cc:** Dalcher, Debra[dalcher.debra@epa.gov]  
**From:** Lamason, Bill  
**Sent:** Tue 1/23/2018 10:51:21 PM  
**Subject:** My notes

Kevin, Per our conversation tonight. Below are some notes I put together for tomorrow's meeting. Please add any bullets you think I missed and are important for the meeting.

I see Scott and you covering the memo with intro from Debra.

## Ex. 5 - Deliberative Process

Thanks!

Bill

\*\*\*

1-24-18 Call with Harlow

- Memo

o Think it is ready to go.

## Ex. 5 - Deliberative Process

- Next steps on OIAI policy

## **Ex. 5 - Deliberative Process**

- ☐ ☐ ☐ ☐ ☐ ☐ RTR's underway.

## **Ex. 5 - Deliberative Process**

## **Ex. 5 - Deliberative Process**

**To:** Harlow, David[harlow.david@epa.gov]  
**Cc:** Lassiter, Penny[Lassiter.Penny@epa.gov]; Culligan, Kevin[Culligan.Kevin@epa.gov]; Dalcher, Debra[dalcher.debra@epa.gov]; Jordan, Scott[Jordan.Scott@epa.gov]; Rodman, Sonja[Rodman.Sonja@epa.gov]; Atkinson, Emily[Atkinson.Emily@epa.gov]  
**From:** Lamason, Bill  
**Sent:** Tue 1/23/2018 8:54:41 PM  
**Subject:** FW: Reclassification of Major Sources as Area Sources Under Section 112\_DHarlow Draft.docx  
Reclassification of Major Sources as Area Sources Under Section 112\_DHarlow Draft.docx

David,

Hope you are well. Attached is the latest version of the memo we believe is about ready to begin signoff process. We left comments in the document on specific areas where we need to check in with you on at our 9:30 am meeting Wednesday morning. We look forward to talking with you about the memo and what we believe are the next steps.

Thank you!

Bill Lamason

**To:** Lamason, Bill[Lamason.Bill@epa.gov]; Culligan, Kevin[Culligan.Kevin@epa.gov]  
**Cc:** Dalcher, Debra[dalcher.debra@epa.gov]  
**From:** Dalcher, Debra  
**Sent:** Tue 1/23/2018 8:10:41 PM  
**Subject:** Reclassification of Major Sources as Area Sources Under Section 112\_DHarlow Draft.docx  
[Reclassification of Major Sources as Area Sources Under Section 112\\_DHarlow Draft.docx](#)

Hi everyone,

This is the version of the memo I believe we want to send to D. Harlow and also have attached to the meeting notice for tomorrow.

I have left comments in the document on specific areas where we want to have a dialogue with David.

This version incorporates comments from Scott, Kevin, Bill, Sonja, and Janet Eck.

Thank you everyone! Debra

**To:** Lassiter, Penny[Lassiter.Penny@epa.gov]  
**Cc:** Dalcher, Debra[dalcher.debra@epa.gov]; Culligan, Kevin[Culligan.Kevin@epa.gov]  
**From:** Lamason, Bill  
**Sent:** Tue 1/23/2018 8:06:42 PM  
**Subject:** RE: Checking on Memo that needs to go up to DC

Penny, OK. We'll do. Thanks and good luck! Bill

**From:** Lassiter, Penny  
**Sent:** Tuesday, January 23, 2018 3:06 PM  
**To:** Lamason, Bill <Lamason.Bill@epa.gov>  
**Cc:** Dalcher, Debra <dalcher.debra@epa.gov>; Culligan, Kevin <Culligan.Kevin@epa.gov>  
**Subject:** Re: Checking on Memo that needs to go up to DC

Go ahead and send it and cc me. I'm in the doctors office with my Dad & I don't know when I can get it it today, so don't wait on me.

Sent from my iPhone

On Jan 23, 2018, at 2:57 PM, Lamason, Bill <Lamason.Bill@epa.gov> wrote:

Yes. Kevin and I have both reviewed it.

**Ex. 5 - Deliberative Process**

## **Ex. 5 - Deliberative Process**

Thanks!

Bill

**From:** Lassiter, Penny



**Sent:** Tuesday, January 23, 2018 2:48 PM  
**To:** Lamason, Bill <[Lamason.Bill@epa.gov](mailto:Lamason.Bill@epa.gov)>  
**Cc:** Dalcher, Debra <[dalcher.debra@epa.gov](mailto:dalcher.debra@epa.gov)>  
**Subject:** Re: Checking on Memo that needs to go up to DC

Bill,

Has Kevin reviewed it?

Sent from my iPhone

On Jan 23, 2018, at 2:26 PM, Lamason, Bill <[Lamason.Bill@epa.gov](mailto:Lamason.Bill@epa.gov)> wrote:

Penny,

Just checking if you will have comments on the OIAI memo or announcement notice or if we should proceed to send to David. Ideally we would like to get him the “almost final” version memo this evening or early tomorrow (Debra arrives at 6:30 am). Let us know.

I am copying Debra on the chance you respond later this evening and Debra can follow up appropriately.

Thanks!

Bill

**To:** Koerber, Mike[Koerber.Mike@epa.gov]; South, Peter[South.Peter@epa.gov]  
**Cc:** French, Chuck[French.Chuck@epa.gov]; Dalcher, Debra[dalcher.debra@epa.gov]; Culligan, Kevin[Culligan.Kevin@epa.gov]; Lassiter, Penny[Lassiter.Penny@epa.gov]  
**From:** Lamason, Bill  
**Sent:** Tue 1/23/2018 1:15:01 PM  
**Subject:** RE: OIAI Options Pager \_ Wehrum Briefing 12 18 17.docx

Mike,

## Ex. 5 - Deliberative Process

Let me know if you have any questions.

Bill

**From:** Koerber, Mike  
**Sent:** Monday, January 22, 2018 5:11 PM  
**To:** Lamason, Bill <Lamason.Bill@epa.gov>; South, Peter <South.Peter@epa.gov>  
**Cc:** French, Chuck <French.Chuck@epa.gov>; Dalcher, Debra <dalcher.debra@epa.gov>; Culligan, Kevin <Culligan.Kevin@epa.gov>  
**Subject:** RE: OIAI Options Pager \_ Wehrum Briefing 12 18 17.docx

## Ex. 5 - Deliberative Process

**From:** Lamason, Bill  
**Sent:** Friday, January 12, 2018 4:16 PM  
**To:** Koerber, Mike <Koerber.Mike@epa.gov>; South, Peter <South.Peter@epa.gov>  
**Cc:** French, Chuck <French.Chuck@epa.gov>; Dalcher, Debra <dalcher.debra@epa.gov>; Culligan, Kevin <Culligan.Kevin@epa.gov>  
**Subject:** RE: OIAI Options Pager \_ Wehrum Briefing 12 18 17.docx

## Ex. 5 - Deliberative Process

## Ex. 5 - Deliberative Process

Thanks!

Bill

**From:** Koerber, Mike  
**Sent:** Friday, January 12, 2018 4:02 PM  
**To:** Lamason, Bill <[Lamason.Bill@epa.gov](mailto:Lamason.Bill@epa.gov)>; South, Peter <[South.Peter@epa.gov](mailto:South.Peter@epa.gov)>  
**Cc:** French, Chuck <[French.Chuck@epa.gov](mailto:French.Chuck@epa.gov)>; Dalcher, Debra <[dalcher.debra@epa.gov](mailto:dalcher.debra@epa.gov)>  
**Subject:** RE: OIAI Options Pager \_ Wehrum Briefing 12 18 17.docx

Bill – Just checking-in on this. What’s happening with the memo? Peter asked for an update.  
Thanks.

Mike

**From:** Lamason, Bill  
**Sent:** Wednesday, December 13, 2017 10:31 AM

**To:** South, Peter <[South.Peter@epa.gov](mailto:South.Peter@epa.gov)>; Koerber, Mike <[Koerber.Mike@epa.gov](mailto:Koerber.Mike@epa.gov)>  
**Cc:** Tsirigotis, Peter <[Tsirigotis.Peter@epa.gov](mailto:Tsirigotis.Peter@epa.gov)>; Eck, Janet <[Eck.Janet@epa.gov](mailto:Eck.Janet@epa.gov)>; Morales, Mariel <[Morales.Mariel@epa.gov](mailto:Morales.Mariel@epa.gov)>; Alston, Lala <[Alston.Lala@epa.gov](mailto:Alston.Lala@epa.gov)>; French, Chuck <[French.Chuck@epa.gov](mailto:French.Chuck@epa.gov)>; Culligan, Kevin <[Culligan.Kevin@epa.gov](mailto:Culligan.Kevin@epa.gov)>; Dalcher, Debra <[dalcher.debra@epa.gov](mailto:dalcher.debra@epa.gov)>  
**Subject:** FW: OIAI Options Pager \_ Wehrum Briefing 12 18 17.docx  
**Importance:** High

Pete and Mike,

Please see the attached pager for the OIAI meeting with Bill Wehrum on Monday. Let us know if you have any questions. Thanks!

Bill

**From:** Dalcher, Debra  
**Sent:** Wednesday, December 13, 2017 9:56 AM  
**To:** Lamason, Bill <[Lamason.Bill@epa.gov](mailto:Lamason.Bill@epa.gov)>  
**Cc:** Dalcher, Debra <[dalcher.debra@epa.gov](mailto:dalcher.debra@epa.gov)>; Jordan, Scott <[Jordan.Scott@epa.gov](mailto:Jordan.Scott@epa.gov)>; McLamb, Marguerite <[McLamb.Marguerite@epa.gov](mailto:McLamb.Marguerite@epa.gov)>; Rodman, Sonja <[Rodman.Sonja@epa.gov](mailto:Rodman.Sonja@epa.gov)>; Culligan, Kevin <[Culligan.Kevin@epa.gov](mailto:Culligan.Kevin@epa.gov)>  
**Subject:** OIAI Options Pager \_ Wehrum Briefing 12 18 17.docx  
**Importance:** High

Bill,

Please send the OIAI briefing pager forward. This version incorporates SJ and SR most recent input.

Note that the OIAI briefing is now scheduled for Monday, 18 Dec.

Thank you, Debra

**To:** Jordan, Scott[Jordan.Scott@epa.gov]  
**Cc:** Dalcher, Debra[dalcher.debra@epa.gov]; Lamason, Bill[Lamason.Bill@epa.gov]; Culligan, Kevin[Culligan.Kevin@epa.gov]; Rodman, Sonja[Rodman.Sonja@epa.gov]  
**From:** Dalcher, Debra  
**Sent:** Mon 1/22/2018 8:56:01 PM  
**Subject:** RE: Reclassification of Major Sources as Area Sources Under Section 112\_Draft\_1 22 18\_1pm.docx  
Comment\_National Resources Defence Council (NRDC) May 4 2007 (1).pdf

Scott,

## Ex. 5 - Attorney Client

That is the last of Kevin's comments. None from Penny yet.

Thank you, Debra

**From:** Dalcher, Debra  
**Sent:** Monday, January 22, 2018 3:02 PM  
**To:** Jordan, Scott <Jordan.Scott@epa.gov>  
**Cc:** Dalcher, Debra <dalcher.debra@epa.gov>  
**Subject:** Reclassification of Major Sources as Area Sources Under Section 112\_Draft\_1 22 18\_1pm.docx

Scott, see attached.

# **Ex. 5 - Attorney Client**

Debra

**To:** Dalcher, Debra[dalcher.debra@epa.gov]  
**Cc:** Rodman, Sonja[Rodman.Sonja@epa.gov]; Culligan, Kevin[Culligan.Kevin@epa.gov]  
**From:** Jordan, Scott  
**Sent:** Mon 1/22/2018 8:11:10 PM  
**Subject:** OIAI - Edits to address Kevin point re non-112 requirements  
Reclassification of Major Sources as Area Sources Under Section 112 Draft 1 22 18 1pm.docx

## Ex. 5 - Attorney Client

Scott Jordan

Air and Radiation Law Office

Office of General Counsel

202-564-7508

**From:** Dalcher, Debra  
**Sent:** Monday, January 22, 2018 3:02 PM  
**To:** Jordan, Scott <Jordan.Scott@epa.gov>  
**Cc:** Dalcher, Debra <dalcher.debra@epa.gov>  
**Subject:** Reclassification of Major Sources as Area Sources Under Section 112\_Draft\_1 22 18\_1pm.docx

Scott, see attached.

## Ex. 5 - Attorney Client



# **Ex. 5 - Attorney Client**

Debra

**To:** Culligan, Kevin[Culligan.Kevin@epa.gov]; Lamason, Bill[Lamason.Bill@epa.gov]  
**Cc:** Dalcher, Debra[dalcher.debra@epa.gov]  
**From:** Dalcher, Debra  
**Sent:** Mon 1/22/2018 8:10:08 PM  
**Subject:** FW: Once-In-Always-In Question

## Ex. 5 - Attorney Client

Just FYI, Debra

**From:** Jordan, Scott  
**Sent:** Monday, January 22, 2018 3:01 PM  
**To:** Dalcher, Debra <dalcher.debra@epa.gov>  
**Cc:** Rodman, Sonja <Rodman.Sonja@epa.gov>  
**Subject:** FW: Once-In-Always-In Question

## Ex. 5 - Attorney Client

Debra –

# Ex. 5 - Attorney Client

Scott Jordan

Air and Radiation Law Office

Office of General Counsel

202-564-7508

**From:** Prabhu, Aditi

**Sent:** Monday, January 22, 2018 2:55 PM

**To:** Jordan, Scott <[Jordan.Scott@epa.gov](mailto:Jordan.Scott@epa.gov)>; Simons, Andrew <[Simons.Andrew@epa.gov](mailto:Simons.Andrew@epa.gov)>

**Cc:** Rodman, Sonja <[Rodman.Sonja@epa.gov](mailto:Rodman.Sonja@epa.gov)>

**Subject:** RE: Once-In-Always-In Question -

**Ex. 5 - Attorney Client**

**Ex. 5 - Attorney Client**

**Ex. 5 - Attorney Client**

Aditi Prabhu  
Office of General Counsel  
U.S. Environmental Protection Agency  
(202)564-2473

**From:** Jordan, Scott

**Sent:** Monday, January 22, 2018 12:52 PM

**To:** Prabhu, Aditi <[Prabhu.Aditi@epa.gov](mailto:Prabhu.Aditi@epa.gov)>; Simons, Andrew <[Simons.Andrew@epa.gov](mailto:Simons.Andrew@epa.gov)>

**Cc:** Rodman, Sonja <[Rodman.Sonja@epa.gov](mailto:Rodman.Sonja@epa.gov)>

**Subject:** Once-In-Always-In Question -

**Ex. 5 - Attorney Client**

# Ex. 5 - Attorney Client

Scott Jordan

Air and Radiation Law Office

Office of General Counsel

202-564-7508

**To:** Culligan, Kevin[Culligan.Kevin@epa.gov]  
**Cc:** Lamason, Bill[Lamason.Bill@epa.gov]  
**From:** Dalcher, Debra  
**Sent:** Mon 1/22/2018 7:24:43 PM  
**Subject:** RE: OIAI Revision Memo\_12.8.17.Wehrum Draft.docx

Okay. Thank you, Debra

**From:** Culligan, Kevin  
**Sent:** Monday, January 22, 2018 2:20 PM  
**To:** Dalcher, Debra <dalcher.debra@epa.gov>  
**Cc:** Lamason, Bill <Lamason.Bill@epa.gov>  
**Subject:** RE: OIAI Revision Memo\_12.8.17.Wehrum Draft.docx

I think we should highlight it for David when we talk to him on Wednesday.

**From:** Dalcher, Debra  
**Sent:** Monday, January 22, 2018 2:08 PM  
**To:** Culligan, Kevin <Culligan.Kevin@epa.gov>  
**Cc:** Lamason, Bill <Lamason.Bill@epa.gov>; Dalcher, Debra <dalcher.debra@epa.gov>  
**Subject:** FW: OIAI Revision Memo\_12.8.17.Wehrum Draft.docx  
**Importance:** High

Kevin,

## Ex. 5 - Deliberative Process

Thank you, Debra

**From:** Dalcher, Debra  
**Sent:** Friday, December 08, 2017 11:17 AM  
**To:** Tsirigotis, Peter <[Tsirigotis.Peter@epa.gov](mailto:Tsirigotis.Peter@epa.gov)>  
**Subject:** OIAI Revision Memo\_12.8.17.Wehrum Draft.docx  
**Importance:** High

Peter,

Here you go.

Please confirm receipt.

Thank you, Debra

**To:** Lamason, Bill[Lamason.Bill@epa.gov]; OAQPS SPPD GL[OAQPS\_SPPD\_GL@epa.gov]  
**Cc:** Tsirigotis, Peter[Tsirigotis.Peter@epa.gov]; Thompson, Fred[Thompson.Fred@epa.gov]; French, Chuck[French.Chuck@epa.gov]; Culligan, Kevin[Culligan.Kevin@epa.gov]  
**From:** Barnett, Keith  
**Sent:** Tue 9/5/2017 12:59:38 PM  
**Subject:** RE: Draft OIAI document for OGC review

Bill:

## Ex. 5 - Deliberative Process

Keith Barnett  
Minerals and Manufacturing Group Leader  
919-541-5605

---

**From:** Lamason, Bill  
**Sent:** Thursday, August 24, 2017 12:32 PM  
**To:** OAQPS SPPD GL <OAQPS\_SPPD\_GL@epa.gov>  
**Cc:** Tsirigotis, Peter <Tsirigotis.Peter@epa.gov>; Thompson, Fred <Thompson.Fred@epa.gov>; French, Chuck <French.Chuck@epa.gov>; Culligan, Kevin <Culligan.Kevin@epa.gov>  
**Subject:** FW: Draft OIAI document for OGC review

Folks,

## Ex. 5 - Deliberative Process

Thanks!

Bill

---

**From:** Torres, Elineth  
**Sent:** Thursday, August 24, 2017 10:19 AM  
**To:** Versace, Paul <Versace.Paul@epa.gov>; Vetter, Rick <Vetter.Rick@epa.gov>; Rodman, Sonja <Rodman.Sonja@epa.gov>  
**Cc:** Lamason, Bill <Lamason.Bill@epa.gov>; McLamb, Marguerite <McLamb.Marguerite@epa.gov>; Dalcher, Debra <dalcher.debra@epa.gov>

**Subject:** Draft OIAI document for OGC review

All,

## **Ex. 5 - Deliberative Process**

Please let me know if you have questions.

Thank You!

## **Ex. 5 - Deliberative Process**

Elineth Torres  
OAQPS  
919-541-4347

---



**To:** Dalcher, Debra[dalcher.debra@epa.gov]  
**Cc:** Lamason, Bill[Lamason.Bill@epa.gov]  
**From:** Culligan, Kevin  
**Sent:** Mon 1/22/2018 7:19:38 PM  
**Subject:** RE: OIAI Revision Memo\_12.8.17.Wehrum Draft.docx

## Ex. 5 - Deliberative Process

**From:** Dalcher, Debra  
**Sent:** Monday, January 22, 2018 2:08 PM  
**To:** Culligan, Kevin <Culligan.Kevin@epa.gov>  
**Cc:** Lamason, Bill <Lamason.Bill@epa.gov>; Dalcher, Debra <dalcher.debra@epa.gov>  
**Subject:** FW: OIAI Revision Memo\_12.8.17.Wehrum Draft.docx  
**Importance:** High

Kevin,

## Ex. 5 - Deliberative Process

## Ex. 5 - Deliberative Process

Thank you, Debra

**From:** Dalcher, Debra  
**Sent:** Friday, December 08, 2017 11:17 AM  
**To:** Tsirigotis, Peter <Tsirigotis.Peter@epa.gov>

**Subject:** OIAI Revision Memo\_12.8.17.Wehrum Draft.docx

**Importance:** High

Peter,

Here you go.

Please confirm receipt.

Thank you, Debra

**To:** Dalcher, Debra[dalcher.debra@epa.gov]; Shrager, Brian[Shrager.Brian@epa.gov]; Lamason, Bill[Lamason.Bill@epa.gov]; McLamb, Marguerite[McLamb.Marguerite@epa.gov]; Jordan, Scott[Jordan.Scott@epa.gov]  
**Cc:** Rodman, Sonja[Rodman.Sonja@epa.gov]  
**From:** Culligan, Kevin  
**Sent:** Tue 1/30/2018 7:27:31 PM  
**Subject:** RE: EPA "Once In, Always In" HAP Policy

## Ex. 5 - Attorney Client/Deliberative Process

**From:** Dalcher, Debra  
**Sent:** Tuesday, January 30, 2018 2:13 PM  
**To:** Shrager, Brian <Shrager.Brian@epa.gov>; Lamason, Bill <Lamason.Bill@epa.gov>; Culligan, Kevin <Culligan.Kevin@epa.gov>; McLamb, Marguerite <McLamb.Marguerite@epa.gov>; Jordan, Scott <Jordan.Scott@epa.gov>  
**Cc:** Rodman, Sonja <Rodman.Sonja@epa.gov>  
**Subject:** FW: EPA "Once In, Always In" HAP Policy  
**Importance:** High

Can anyone help with this one?

**From:** Jared Rothstein [<mailto:rothsteinj@socma.com>]  
**Sent:** Tuesday, January 30, 2018 1:48 PM  
**To:** Torres, Elineth <[Torres.Elineth@epa.gov](mailto:Torres.Elineth@epa.gov)>; Dalcher, Debra <[dalcher.debra@epa.gov](mailto:dalcher.debra@epa.gov)>  
**Subject:** EPA "Once In, Always In" HAP Policy

Hello Debra and Elineth,

I recently reviewed the U.S. EPA [guidance memorandum](#) announcing its withdrawal of its “once in always in” policy for the classification of major sources of hazardous air pollutants under section 112 of the Clean Air Act, and had a couple questions regarding implementation. Do you know which states have the delegated authority to ratify this change in policy? My understanding is that it would only apply to the states that have been delegated by EPA to administer the 112 program. I assume EPA’s position is that the states with delegated authority are obliged to follow the new policy if they want to maintain their delegation, because the new memo says clearly that the old policy is not authorized by the statute? Any information you might have regarding state adoption of the policy would be very helpful.

Thank you!

Jared

**Jared A. Rothstein** | *Senior Manager, Regulatory Affairs*

Society of Chemical Manufacturers & Affiliates (SOCMA)

1400 Crystal Drive | Suite 630 | Arlington, VA 22202

(571) 348-5122 | [rothsteinj@socma.com](mailto:rothsteinj@socma.com)

**To:** Dalcher, Debra[dalcher.debra@epa.gov]; Cortelyou-Lee, Jan[Cortelyou-Lee.Jan@epa.gov]  
**Cc:** Lamason, Bill[Lamason.Bill@epa.gov]; Shrager, Brian[Shrager.Brian@epa.gov]  
**From:** Culligan, Kevin  
**Sent:** Wed 1/24/2018 9:22:38 PM  
**Subject:** RE: Examples as Requested

Maybe here:

<https://www3.epa.gov/ttn/atw/eparules.html>

**From:** Dalcher, Debra  
**Sent:** Wednesday, January 24, 2018 4:07 PM  
**To:** Cortelyou-Lee, Jan <Cortelyou-Lee.Jan@epa.gov>  
**Cc:** Lamason, Bill <Lamason.Bill@epa.gov>; Culligan, Kevin <Culligan.Kevin@epa.gov>; Shrager, Brian <Shrager.Brian@epa.gov>  
**Subject:** RE: Examples as Requested

Jan,

I am really not sure. Possibly Bill, Kevin, or Brian could provide advice.

Thanks, Debra

**From:** Cortelyou-Lee, Jan  
**Sent:** Wednesday, January 24, 2018 3:55 PM  
**To:** Lamason, Bill <Lamason.Bill@epa.gov>; Dalcher, Debra <dalcher.debra@epa.gov>  
**Subject:** RE: Examples as Requested

I'm also trying to think about where this should be posted on the web. We haven't yet moved the General Provisions stuff over to Drupal – there is a lot of stuff there but I did find the 2007 and 2003 proposals on that page.

Should we post the new memo separately and link to the earlier proposals? I don't see the Seitz memo on the General Provisions page.

Jan Cortelyou-Lee

US Environmental Protection Agency

Office of Air Quality Planning and Standards

MD-C404-03

109 TW Alexander Drive

Research Triangle Park, NC 27709

Desk: 919-541-5393

Cell: 919-368-5734

**From:** Lamason, Bill

**Sent:** Wednesday, January 24, 2018 3:25 PM

**To:** Cortelyou-Lee, Jan <[Cortelyou-Lee.Jan@epa.gov](mailto:Cortelyou-Lee.Jan@epa.gov)>; Dalcher, Debra <[dalcher.debra@epa.gov](mailto:dalcher.debra@epa.gov)>

**Subject:** RE: Examples as Requested

Jan, I'm responding for Debra as she's pulling together the blue folder.

## Ex. 5 - Deliberative Process

## Ex. 5 - Deliberative Process

Also, be advised that ECOS has a standing committee on OIAI that checks in periodically on the issue. They may need be on a short list for particular outreach steps if OAR is planning such. I mentioned ECOS to Jenny but can't remember how I characterized their interest. Definitely will be interested!

Let us know if you have any questions.

Bill

**From:** Cortelyou-Lee, Jan  
**Sent:** Wednesday, January 24, 2018 3:04 PM  
**To:** Dalcher, Debra <[dalcher.debra@epa.gov](mailto:dalcher.debra@epa.gov)>  
**Cc:** Lamason, Bill <[Lamason.Bill@epa.gov](mailto:Lamason.Bill@epa.gov)>  
**Subject:** RE: Examples as Requested

Thanks Debra

When we talk about modifying regulatory text – is that in the general provisions?

Jan Cortelyou-Lee

US Environmental Protection Agency

Office of Air Quality Planning and Standards

MD-C404-03

109 TW Alexander Drive

Research Triangle Park, NC 27709

Desk: 919-541-5393

Cell: 919-368-5734

**From:** Dalcher, Debra

**Sent:** Wednesday, January 24, 2018 12:08 PM

**To:** Cortelyou-Lee, Jan <[Cortelyou-Lee.Jan@epa.gov](mailto:Cortelyou-Lee.Jan@epa.gov)>

**Cc:** Lamason, Bill <[Lamason.Bill@epa.gov](mailto:Lamason.Bill@epa.gov)>

**Subject:** Examples as Requested

Thanks Jan. If you need anything else, please don't hesitate to reach out.

Debra

## **Ex. 5 - Deliberative Process**

## **Ex. 5 - Deliberative Process**



# **Ex. 5 - Deliberative Process**

Debra S. Dalcher

U.S. EPA

Policy and Strategies Group

Sector Policies and Programs Division, OAQPS

109 T.W. Alexander Drive

Research Triangle Park, NC 27711

Phone: 919-541-2443

**To:** Santiago, Juan[Santiago.Juan@epa.gov]  
**From:** Culligan, Kevin  
**Sent:** Wed 1/24/2018 5:00:12 PM  
**Subject:** FW: Revised OI/AI memorandum  
[dshReclassification of Major Sources as Area Sources Under Section 112\\_DHarlow Draft.docx](#)

This is what I'm going to call about.

**From:** Harlow, David  
**Sent:** Wednesday, January 24, 2018 11:03 AM  
**To:** Lamason, Bill <Lamason.Bill@epa.gov>; Jordan, Scott <Jordan.Scott@epa.gov>; Culligan, Kevin <Culligan.Kevin@epa.gov>; Dalcher, Debra <dalcher.debra@epa.gov>; Rodman, Sonja <Rodman.Sonja@epa.gov>; Lassiter, Penny <Lassiter.Penny@epa.gov>  
**Subject:** Revised OI/AI memorandum

All,

Attached is a new draft of the memorandum, revised to reflect what was discussed on our call, the suggested language sent to me subsequent to our call, the few interlineal edits Bill Wehrum had provided to me this morning on yesterday afternoon's draft, and some of my own edits on yesterday's draft.

The "underlying" document remains yesterday's draft, which Bill Lamason had circulated. I "accepted all" of the "track change" changes that earlier draft reflected, and then edited accordingly. (I mention this only in case I didn't properly turn off "track changes" or otherwise misfired in some way in producing this new version.)

I did take the liberty of scrubbing out all of the "the's" before "EPA." I think I got them all.

Bill Wehrum and I appreciate all your good and fast work on this.

Sonja, I leave it to you or Scott to forward this to Justin and anyone else in OGC who should review it.

Thank you.

**David S. Harlow**  
**Senior Counsel**

**Immediate Office of the Assistant Administrator**  
**Office of Air and Radiation, USEPA**  
**WJC-N Room 5409K**

**1200 Pennsylvania Avenue NW**  
**Washington, DC 20460**  
**202-564-1233**

[Harlow.David@epa.gov](mailto:Harlow.David@epa.gov)

**To:** Ashley, Jackie[Ashley.Jackie@epa.gov]; Lamason, Bill[Lamason.Bill@epa.gov]; Dalcher, Debra[dalcher.debra@epa.gov]  
**Cc:** Noonan, Jenny[Noonan.Jenny@epa.gov]; Mills, Kathy[Mills.Kathy@epa.gov]  
**From:** Culligan, Kevin  
**Sent:** Fri 1/26/2018 7:48:17 PM  
**Subject:** RE: PRESS: MEDIA INQUIRY - Vox. Major Sources reclassification under Section 112. (TODAY, 1/26 @ 1 PM)

## Ex. 5 - Deliberative Process

## Ex. 5 - Deliberative Process

## Ex. 5 - Deliberative Process

**From:** Ashley, Jackie  
**Sent:** Friday, January 26, 2018 2:37 PM  
**To:** Lamason, Bill <Lamason.Bill@epa.gov>; Dalcher, Debra <dalcher.debra@epa.gov>; Culligan, Kevin <Culligan.Kevin@epa.gov>  
**Cc:** Noonan, Jenny <Noonan.Jenny@epa.gov>; Mills, Kathy <Mills.Kathy@epa.gov>  
**Subject:** RE: PRESS: MEDIA INQUIRY - Vox. Major Sources reclassification under Section 112. (TODAY, 1/26 @ 1 PM)

Bill - Here's the ECOs resolution that we discussed might be relevant. Attached and also available here: <https://www.ecos.org/documents/resolution-00-12-change-to-the-united-states->

[environmental-protection-agencys-once-in-always-in-policy/](#)

## Ex. 5 - Deliberative Process

-----  
Jackie Ashley - US EPA - Office of Air Quality Planning and Standards - 919-541-7664 –  
[ashley.jackie@epa.gov](mailto:ashley.jackie@epa.gov)

**From:** Lamason, Bill

**Sent:** Friday, January 26, 2018 2:04 PM

**To:** Ashley, Jackie <[Ashley.Jackie@epa.gov](mailto:Ashley.Jackie@epa.gov)>; Dalcher, Debra <[dalcher.debra@epa.gov](mailto:dalcher.debra@epa.gov)>;  
Culligan, Kevin <[Culligan.Kevin@epa.gov](mailto:Culligan.Kevin@epa.gov)>

**Cc:** Noonan, Jenny <[Noonan.Jenny@epa.gov](mailto:Noonan.Jenny@epa.gov)>; Mills, Kathy <[Mills.Kathy@epa.gov](mailto:Mills.Kathy@epa.gov)>

**Subject:** RE: PRESS: MEDIA INQUIRY - Vox. Major Sources reclassification under Section 112. (TODAY, 1/26 @ 1 PM)

Jackie, Here's some thoughts. Kevin, Look at both but especially #4 response – any thoughts? B

## Ex. 5 - Deliberative Process

## Ex. 5 - Deliberative Process

## Ex. 5 - Deliberative Process

## Ex. 5 - Deliberative Process

## Ex. 5 - Deliberative Process

**From:** Ashley, Jackie

**Sent:** Friday, January 26, 2018 1:47 PM

**To:** Lamason, Bill <[Lamason.Bill@epa.gov](mailto:Lamason.Bill@epa.gov)>; Dalcher, Debra <[dalcher.debra@epa.gov](mailto:dalcher.debra@epa.gov)>

**Cc:** Noonan, Jenny <[Noonan.Jenny@epa.gov](mailto:Noonan.Jenny@epa.gov)>; Mills, Kathy <[Mills.Kathy@epa.gov](mailto:Mills.Kathy@epa.gov)>

**Subject:** PRESS: MEDIA INQUIRY - Vox. Major Sources reclassification under Section 112.  
(TODAY, 1/26 @ 1 PM)

Bill and Debra –

The media outlet “Vox” has asked a number of questions about the OIAO withdrawal memo. We are clearly not going to make the deadline, and the press office is checking with whether the

## Ex. 5 - Deliberative Process

-----  
Jackie Ashley - US EPA - Office of Air Quality Planning and Standards - 919-541-7664 –  
[ashley.jackie@epa.gov](mailto:ashley.jackie@epa.gov)

**From:** Lynn, Tricia  
**Sent:** Friday, January 26, 2018 11:52 AM  
**To:** DeLuca, Isabel <[DeLuca.Isabel@epa.gov](mailto:DeLuca.Isabel@epa.gov)>  
**Cc:** Millett, John <[Millett.John@epa.gov](mailto:Millett.John@epa.gov)>  
**Subject:** MEDIA INQUIRY - Vox. Major Sources reclassification under Section 112. (TODAY, 1/26 @ 1 PM)

His email is below in case it helps clarify the questions. His deadline is probably impossible...I've asked for more time, but I appreciate any efforts to expedite this one.

Deadline: TODAY: 1/26/18, 1 PM

Outlet: Vox

Reporter: Umair Irfan

[umair@vox.com](mailto:umair@vox.com)

Context:

I'm going through the new memo on reclassifying major sources of pollution as area sources.

Reporter Questions:

1. Clarify how the new guidance "continu[es] to ensure stringent and effective controls on hazardous air pollutants" if it moves the pollution benchmark to a less stringent standard.
2. Is the assumption that sources that are already in compliance with the major source standard will remain so under the area standard?
3. If that's the case, how does that reduce the regulatory burden for sources already meeting the standard?
4. How is the existing rule a "longstanding disincentive for sources to implement voluntary pollution abatement?" Is the argument here that mandatory compliance discourages voluntary compliance with pollution rules?
5. What do you anticipate is the net effect of this guidance?
6. Is the goal to reduce compliance costs for regulated industries or enforcement costs for the agency?
7. Is it possible that air pollution would increase with this new guidance?

**From:** Umair Irfan [<mailto:umair@vox.com>]

**Sent:** Friday, January 26, 2018 11:09 AM

**To:** Press <[Press@epa.gov](mailto:Press@epa.gov)>

**Subject:** Media Inquiry: Major Sources reclassification under Section 112

Hi,

I'm going through the new memo on reclassifying major sources of pollution as area sources. I'm hoping someone at EPA could clarify how the new guidance "continu[es] to ensure stringent and effective controls on hazardous air pollutants" if it moves the pollution benchmark to a less stringent standard. Is the assumption that sources that are already in compliance with the major source standard will remain so under the area standard? If that's the case, how does that reduce the regulatory burden for sources already meeting the standard?

In addition, I'm hoping someone could elaborate on how the existing rule is a "longstanding



disincentive for sources to implement voluntary pollution abatement." Is the argument here that mandatory compliance discourages voluntary compliance with pollution rules?

And what do you anticipate is the net effect of this guidance? Is the goal to reduce compliance costs for regulated industries or enforcement costs for the agency? And is it possible that air pollution would increase with this new guidance?

Thanks!

Umair Irfan | [@umairfan](#)

Staff Writer | (202) 991-7676

1201 Connecticut Ave. NW, Floor 12 | Washington, DC 20036

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[The Verge](#), [Polygon](#), [Recode](#), [Eater](#), [Curbed](#), and [Racked](#)

Subscribe to [Worldly](#), Vox.com's new roundtable foreign policy podcast

**From:** Culligan, Kevin  
**Location:** RTP-OAQPS-919-541-4332-SPPD/Phone-Line/RTP-OAQPS-BLDG-C  
**Importance:** Normal  
**Subject:** FW: OIAI Discussion - Agenda will be Added / Memo w/SJ Edits Attached  
**Start Date/Time:** Mon 1/8/2018 4:00:00 PM  
**End Date/Time:** Mon 1/8/2018 5:00:00 PM  
OIAI.RevisedOIAImemorandum 1 5 2018+ SJJ 1.8.18.docx

-----Original Appointment-----

**From:** Dalcher, Debra  
**Sent:** Friday, January 05, 2018 3:00 PM  
**To:** Dalcher, Debra; Jordan, Scott; Culligan, Kevin  
**Cc:** Lamason, Bill  
**Subject:** OIAI Discussion - Agenda will be Added / Memo w/SJ Edits Attached  
**When:** Monday, January 08, 2018 11:00 AM-12:00 PM (UTC-05:00) Eastern Time (US & Canada).  
**Where:** RTP-OAQPS; Ex. 6 - Personal Privacy SPPD/Phone-Line/RTP-OAQPS-BLDG-C

Agenda

Wehrum Version of Memo

## Ex. 5 - Deliberative Process

## **Ex. 5 - Deliberative Process**

## **Ex. 5 - Deliberative Process**

**To:** McLamb, Marguerite[McLamb.Marguerite@epa.gov]; Lamason, Bill[Lamason.Bill@epa.gov];  
Dalcher, Debra[dalcher.debra@epa.gov]  
**From:** Culligan, Kevin  
**Sent:** Tue 11/21/2017 6:20:05 PM  
**Subject:** Brief thoughts on Once in Always In

# Ex. 5 - Deliberative Process

# **Ex. 5 - Deliberative Process**

**To:** Culligan, Kevin[Culligan.Kevin@epa.gov]  
**From:** Culligan, Kevin  
**Sent:** Wed 11/8/2017 7:19:57 PM  
**Subject:** Reasons for change to once in always in

## **Ex. 5 - Deliberative Process**

**To:** Jordan, Scott[Jordan.Scott@epa.gov]; Dalcher, Debra[dalcher.debra@epa.gov]  
**Cc:** Rodman, Sonja[Rodman.Sonja@epa.gov]  
**From:** Culligan, Kevin  
**Sent:** Mon 1/22/2018 8:12:33 PM  
**Subject:** Ex. 5 - Deliberative Process

I like Scott's edit.

**From:** Jordan, Scott  
**Sent:** Monday, January 22, 2018 3:11 PM  
**To:** Dalcher, Debra <dalcher.debra@epa.gov>  
**Cc:** Rodman, Sonja <Rodman.Sonja@epa.gov>; Culligan, Kevin <Culligan.Kevin@epa.gov>  
**Subject:** OIAI - Edits to address Kevin point re non-112 requirements

# Ex. 5 - Attorney Client

Scott Jordan

Air and Radiation Law Office

Office of General Counsel

202-564-7508

**From:** Dalcher, Debra  
**Sent:** Monday, January 22, 2018 3:02 PM  
**To:** Jordan, Scott <[Jordan.Scott@epa.gov](mailto:Jordan.Scott@epa.gov)>

**Cc:** Dalcher, Debra <[dalcher.debra@epa.gov](mailto:dalcher.debra@epa.gov)>

**Subject:** Reclassification of Major Sources as Area Sources Under Section 112\_Draft\_1 22  
18\_1pm.docx

Scott, see attached.

# Ex. 5 - Attorney Client

Debra



**To:** Dalcher, Debra[dalcher.debra@epa.gov]  
**From:** Bradfield, John  
**Sent:** Tue 11/21/2017 8:47:57 PM  
**Subject:** RE: Examples OIAI

Gobble Gobble

John Bradfield

Environmental Engineer

U.S. EPA | Natural Resources Group | Sector Policies and Programs Division, OAQPS

109 T.W. Alexander Drive (Mail Drop E143-03) | Research Triangle Park, NC 27711

Phone: 919.541.3062 | email: [Bradfield.John@epa.gov](mailto:Bradfield.John@epa.gov)

**From:** Dalcher, Debra  
**Sent:** Tuesday, November 21, 2017 2:36 PM  
**To:** Dunkins, Robin <Dunkins.Robin@epa.gov>  
**Cc:** Torres, Elineth <Torres.Elineth@epa.gov>; Lamason, Bill <Lamason.Bill@epa.gov>; Schrock, Bill <Schrock.Bill@epa.gov>; Hanks, Katie <hanks.katie@epa.gov>; Bradfield, John <Bradfield.John@epa.gov>  
**Subject:** RE: Examples OIAI

Thank you Robin, Bill, Katie, and John.

I appreciate all of the work you put into this. I will review and follow-up with questions if needed.

Happy Thanksgiving everyone, Debra

**From:** Dunkins, Robin

**Sent:** Tuesday, November 21, 2017 2:24 PM

**To:** Dalcher, Debra <[dalcher.debra@epa.gov](mailto:dalcher.debra@epa.gov)>

**Cc:** Torres, Elineth <[Torres.Elineth@epa.gov](mailto:Torres.Elineth@epa.gov)>; Lamason, Bill <[Lamason.Bill@epa.gov](mailto:Lamason.Bill@epa.gov)>; Schrock, Bill <[Schrock.Bill@epa.gov](mailto:Schrock.Bill@epa.gov)>; Hanks, Katie <[hanks.katie@epa.gov](mailto:hanks.katie@epa.gov)>; Bradfield, John <[Bradfield.John@epa.gov](mailto:Bradfield.John@epa.gov)>

**Subject:** RE: Examples OIAI

## **Ex. 5 - Deliberative Process**

## **Ex. 5 - Deliberative Process**

# **Ex. 5 - Deliberative Process**

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# **Ex. 5 - Deliberative Process**

Robin Dunkins, Group Leader

Natural Resources Group

OAR/OAQPS/SPPD Mail Code: E143-03

U.S. Environmental Protection Agency

Research Triangle Park, NC 27711

919-541-5335

[dunkins.robin@epa.gov](mailto:dunkins.robin@epa.gov)

**From:** Dalcher, Debra

**Sent:** Wednesday, November 15, 2017 1:21 PM

**To:** Dunkins, Robin <[Dunkins.Robin@epa.gov](mailto:Dunkins.Robin@epa.gov)>

**Cc:** Torres, Elineth <[Torres.Elineth@epa.gov](mailto:Torres.Elineth@epa.gov)>; Dalcher, Debra <[dalcher.debra@epa.gov](mailto:dalcher.debra@epa.gov)>;

Lamason, Bill <[Lamason.Bill@epa.gov](mailto:Lamason.Bill@epa.gov)>

**Subject:** Examples OIAI

**Importance:** High

Robin,

## Ex. 5 - Deliberative Process

Thank you much, Debra

**From:** Torres, Elineth

**Sent:** Wednesday, November 15, 2017 1:17 PM

**To:** Dalcher, Debra <[dalcher.debra@epa.gov](mailto:dalcher.debra@epa.gov)>

**Subject:** examples OIAI

## Ex. 5 - Deliberative Process

# **Ex. 5 - Deliberative Process**

Elineth Torres

OAQPS

919-541-4347

**From:** Torres, Elineth  
**Location:** RTP-D201-Max40/RTP-Bldg-D;  
**Line/RTP-OAQPS-BLDG-C**  
**Importance:** Normal  
**Subject:** OIAI Discussion: Principle-based policy  
**Start Date/Time:** Wed 9/20/2017 7:00:00 PM  
**End Date/Time:** Wed 9/20/2017 7:30:00 PM  
OIAI Options Pager 09 05 17 Clean Working Doc.docx

## Ex. 6 - Personal Privacy

I have shortened this meeting to 30 mins today and I will be scheduling a follow-up meeting for next week so we can continue the conversation that we start today.

Thanks,  
Elineth

\*\*\*\*\*

Call-in number

Ex. 5 - Deliberative Process

\*\*\*\*\*

All,

## Ex. 5 - Deliberative Process

Thanks,  
Elineth

**From:** Dalcher, Debra  
**Location:** RTP-OAQPS-9 Ex. 6 - Personal Privacy D/Phone-Line/RTP-OAQPS-BLDG-C  
**Importance:** Normal  
**Subject:** OIAI Discussion - Agenda will be Added / Memo w/SJ Edits Attached  
**Start Date/Time:** Mon 1/8/2018 4:00:00 PM  
**End Date/Time:** Mon 1/8/2018 5:00:00 PM  
OIAI.RevisedOIAImemorandum 1 5 2018+ SJJ 1.8.18.docx

## Agenda

# Ex. 5 - Deliberative Process

## **Ex. 5 - Deliberative Process**



**From:** Dalcher, Debra

## **Ex. 6 - Personal Privacy**

**Importance:** High

**Subject:** OIAI re. (Pollution Prevention re. Coatings, Industrial Boilers, etc.) - Write-up Added

**Start Date/Time:** Tue 11/14/2017 3:00:00 PM

**End Date/Time:** Tue 11/14/2017 3:30:00 PM

## **Ex. 5 - Deliberative Process**

**To:** Dalcher, Debra[dalcher.debra@epa.gov]  
**Cc:** Rodman, Sonja[Rodman.Sonja@epa.gov]; Lamason, Bill[Lamason.Bill@epa.gov]  
**From:** Jordan, Scott  
**Sent:** Thur 1/25/2018 6:49:23 PM  
**Subject:** OAI - OGC Comments on FR Notice  
FRN Notice of Memorandum Availability Draft 01 25 18 JE DD.DOCX

Debra –

# Ex. 5 - Attorney Client

Scott Jordan

Air and Radiation Law Office

Office of General Counsel

202-564-7508

**From:** Dalcher, Debra  
**Sent:** Thursday, January 25, 2018 12:08 PM  
**To:** Jordan, Scott <Jordan.Scott@epa.gov>  
**Cc:** Rodman, Sonja <Rodman.Sonja@epa.gov>; Dalcher, Debra <dalcher.debra@epa.gov>;  
Lamason, Bill <Lamason.Bill@epa.gov>  
**Subject:** FRN Notice of Memorandum Availability Draft 01 25 18 JE DD.docx  
**Importance:** High

Scott,

Here is the FR Notice. Thank you, Debra

**To:** Dalcher, Debra[dalcher.debra@epa.gov]  
**Cc:** Shrager, Brian[Shrager.Brian@epa.gov]  
**From:** Modak, Nabanita  
**Sent:** Tue 11/21/2017 10:26:51 PM  
**Subject:** RE: See Kevin's bullet below  
[emission limits of CISWI vs. PCNESHAP and Boiler MACT.docx](#)

Here are two cents ( in blue text next to Brian's feedback).

Thanks

Nabanita

**From:** Dalcher, Debra  
**Sent:** Tuesday, November 21, 2017 2:47 PM  
**To:** Modak, Nabanita <Modak.Nabanita@epa.gov>  
**Cc:** Shrager, Brian <Shrager.Brian@epa.gov>  
**Subject:** RE: See Kevin's bullet below

Nabanita,

## Ex. 5 - Deliberative Process

Thank you, Debra

**From:** Shrager, Brian  
**Sent:** Tuesday, November 21, 2017 2:26 PM  
**To:** Dalcher, Debra <[dalcher.debra@epa.gov](mailto:dalcher.debra@epa.gov)>  
**Cc:** Modak, Nabanita <[Modak.Nabanita@epa.gov](mailto:Modak.Nabanita@epa.gov)>  
**Subject:** RE: See Kevin's bullet below

Debra,

## **Ex. 5 - Deliberative Process**

## **Ex. 5 - Deliberative Process**

## **Ex. 5 - Deliberative Process**

## **Ex. 5 - Deliberative Process**

Sorry for the lengthy reply!

Brian

**From:** Dalcher, Debra  
**Sent:** Tuesday, November 21, 2017 1:54 PM  
**To:** Shrager, Brian <[Shrager.Brian@epa.gov](mailto:Shrager.Brian@epa.gov)>  
**Cc:** Dalcher, Debra <[dalcher.debra@epa.gov](mailto:dalcher.debra@epa.gov)>  
**Subject:** See Kevin's bullet below

## **Ex. 5 - Deliberative Process**

## **Ex. 5 - Deliberative Process**

Thanks, Debra

Debra S. Dalcher

U.S. EPA

Policy and Strategies Group

Sector Policies and Programs Division, OAQPS

109 T.W. Alexander Drive

Research Triangle Park, NC 27711

Phone: 919-541-2443

**To:** Eck, Janet[Eck.Janet@epa.gov]; Dalcher, Debra[dalcher.debra@epa.gov]  
**From:** Lamason, Bill  
**Sent:** Thur 1/25/2018 6:48:03 PM  
**Subject:** FW: OIAI.Reclassification of Major Sources as Area Sources Under Section 112 Draft\_01 25 2018-Final OGC Comments.1.25.18\_PSG.docx

## **Ex. 5 - Deliberative Process**

**From:** Harlow, David  
**Sent:** Thursday, January 25, 2018 1:45 PM  
**To:** Lamason, Bill <Lamason.Bill@epa.gov>  
**Subject:** RE: OIAI.Reclassification of Major Sources as Area Sources Under Section 112 Draft\_01 25 2018-Final OGC Comments.1.25.18\_PSG.docx

## **Ex. 5 - Deliberative Process**

**David S. Harlow**  
**Senior Counsel**

**Immediate Office of the Assistant Administrator**  
**Office of Air and Radiation, USEPA**  
**WJC-N Room 5409K**



**1200 Pennsylvania Avenue NW**  
**Washington, DC 20460**  
**202-564-1233**

[Harlow.David@epa.gov](mailto:Harlow.David@epa.gov)

**From:** Lamason, Bill  
**Sent:** Thursday, January 25, 2018 1:41 PM  
**To:** Harlow, David <[harlow.david@epa.gov](mailto:harlow.david@epa.gov)>; Culligan, Kevin <[Culligan.Kevin@epa.gov](mailto:Culligan.Kevin@epa.gov)>  
**Cc:** Dalcher, Debra <[dalcher.debra@epa.gov](mailto:dalcher.debra@epa.gov)>  
**Subject:** OIAI.Reclassification of Major Sources as Area Sources Under Section 112 Draft\_01  
25 2018-Final OGC Comments.1.25.18\_PSG.docx

David, These are the final edits. Kevin will discuss the yellow highlighted text with you. If you do not connect, please call me.

We await OAR approval. Thanks! Bill

**To:** Jordan, Scott[Jordan.Scott@epa.gov]  
**Cc:** Dalcher, Debra[dalcher.debra@epa.gov]; Lamason, Bill[Lamason.Bill@epa.gov]  
**From:** Dalcher, Debra  
**Sent:** Tue 12/5/2017 3:27:40 PM  
**Subject:** OIAI memo\_12 5 version  
[OIAI Revision Memo\\_12.5.17\\_DD.docx](#)

Only sending to you Scott for review. I would like to send out to everyone else later today.

Feel free to review/edit. Thank you, Debra

## Ex. 5 - Deliberative Process

**To:** Vetter, Rick[Vetter.Rick@epa.gov]; McLamb, Marguerite[McLamb.Marguerite@epa.gov]; Rodman, Sonja[Rodman.Sonja@epa.gov]  
**Cc:** Torres, Elineth[Torres.Elineth@epa.gov]; Lamason, Bill[Lamason.Bill@epa.gov]  
**From:** Dalcher, Debra  
**Sent:** Thur 11/16/2017 7:27:27 PM  
**Subject:** RE: Current Version of Revision Memo

Rick,

## Ex. 5 - Deliberative Process

## Ex. 5 - Deliberative Process

Bill will send out a revised version of this memo at the end of the day. I am updating now.

Thank you everyone, Debra

**From:** Vetter, Rick  
**Sent:** Thursday, November 16, 2017 2:15 PM  
**To:** Dalcher, Debra <dalcher.debra@epa.gov>; McLamb, Marguerite <McLamb.Marguerite@epa.gov>; Lamason, Bill <Lamason.Bill@epa.gov>; Rodman, Sonja <Rodman.Sonja@epa.gov>  
**Cc:** Torres, Elineth <Torres.Elineth@epa.gov>  
**Subject:** RE: Current Version of Revision Memo

## Ex. 5 - Deliberative Process

Rick

Richard H. Vetter

Richard H. Vetter

Attorney Advisor

Air & Radiation Law Office

Office of General Counsel

[vetter.rick@epa.gov](mailto:vetter.rick@epa.gov)

919-541-2127

**From:** Dalcher, Debra

**Sent:** Thursday, November 16, 2017 1:40 PM

**To:** Vetter, Rick <[Vetter.Rick@epa.gov](mailto:Vetter.Rick@epa.gov)>; McLamb, Marguerite  
<[McLamb.Marguerite@epa.gov](mailto:McLamb.Marguerite@epa.gov)>; Lamason, Bill <[Lamason.Bill@epa.gov](mailto:Lamason.Bill@epa.gov)>; Rodman, Sonja  
<[Rodman.Sonja@epa.gov](mailto:Rodman.Sonja@epa.gov)>

**Cc:** Torres, Elineth <[Torres.Elineth@epa.gov](mailto:Torres.Elineth@epa.gov)>

**Subject:** RE: Current Version of Revision Memo

Rick,

This is the current version.

Thank you, Debra

**From:** Vetter, Rick

**Sent:** Thursday, November 16, 2017 1:30 PM

**To:** Dalcher, Debra <[dalcher.debra@epa.gov](mailto:dalcher.debra@epa.gov)>; McLamb, Marguerite  
<[McLamb.Marguerite@epa.gov](mailto:McLamb.Marguerite@epa.gov)>; Lamason, Bill <[Lamason.Bill@epa.gov](mailto:Lamason.Bill@epa.gov)>; Rodman, Sonja  
<[Rodman.Sonja@epa.gov](mailto:Rodman.Sonja@epa.gov)>

**Cc:** Torres, Elineth <[Torres.Elineth@epa.gov](mailto:Torres.Elineth@epa.gov)>  
**Subject:** RE: Current Version of Revision Memo

Debra,

## Ex. 5 - Attorney Client

Rick

Richard H. Vetter

Richard H. Vetter

Attorney Advisor

Air & Radiation Law Office

Office of General Counsel

[vetter.rick@epa.gov](mailto:vetter.rick@epa.gov)

919-541-2127

**From:** Dalcher, Debra  
**Sent:** Monday, November 13, 2017 4:09 PM  
**To:** McLamb, Marguerite <[McLamb.Marguerite@epa.gov](mailto:McLamb.Marguerite@epa.gov)>; Vetter, Rick <[Vetter.Rick@epa.gov](mailto:Vetter.Rick@epa.gov)>; Lamason, Bill <[Lamason.Bill@epa.gov](mailto:Lamason.Bill@epa.gov)>; Rodman, Sonja <[Rodman.Sonja@epa.gov](mailto:Rodman.Sonja@epa.gov)>  
**Cc:** Dalcher, Debra <[dalcher.debra@epa.gov](mailto:dalcher.debra@epa.gov)>; Torres, Elineth <[Torres.Elineth@epa.gov](mailto:Torres.Elineth@epa.gov)>  
**Subject:** Current Version of Revision Memo  
**Importance:** High

As promised during our meeting this morning I am sending out the current working draft of the memo for your review/any comments.

Elineth and I will begin work on this again tomorrow. We would appreciate any feedback you might have on the attached.

Thank you, Debra

Debra S. Dalcher

U.S. EPA

Policy and Strategies Group

Sector Policies and Programs Division, OAQPS

109 T.W. Alexander Drive

Research Triangle Park, NC 27711

Phone: 919-541-2443

**To:** Eck, Janet[Eck.Janet@epa.gov]  
**From:** Dalcher, Debra  
**Sent:** Mon 1/22/2018 6:39:58 PM  
**Subject:** FW: OIAO - Example of FR Notice from Sonja  
[2017-26422.pdf](#)  
[FRN OIAI Guidance Memorandum 1\\_19\\_18+SJJ 1.22.18.docx](#)

Janet,

## Ex. 5 - Attorney Client

Thank you, Debra

-----Original Message-----

**From:** Jordan, Scott  
**Sent:** Monday, January 22, 2018 1:10 PM  
**To:** Rodman, Sonja <Rodman.Sonja@epa.gov>; Dalcher, Debra <dalcher.debra@epa.gov>  
**Subject:** OIAO - Example of FR Notice from Sonja

## Ex. 5 - Attorney Client

Scott Jordan  
Air and Radiation Law Office  
Office of General Counsel  
202-564-7508

-----Original Message-----

**From:** Rodman, Sonja  
**Sent:** Monday, January 22, 2018 12:42 PM  
**To:** Jordan, Scott <Jordan.Scott@epa.gov>  
**Subject:** FW: Notice of availability of our statutory interpretation in the RFS program

## Ex. 5 - Attorney Client

Sonja L. Rodman

Air Toxics, Consumer Protection and Indoor Air Practice Group  
(202) 564-4079

CONFIDENTIALITY NOTICE: This message may contain sensitive, privileged information covered by the deliberative process, attorney-client and/or attorney work product privileges. Do not release this message under FOIA without appropriate review. If you are not the intended recipient, or the employee or agent responsible to deliver it to the intended recipient, please contact the sender and delete all copies.

-----Original Message-----

From: Orlin, David

Sent: Monday, January 22, 2018 12:34 PM

To: Rodman, Sonja <Rodman.Sonja@epa.gov>

Cc: Li, Ryland (Shengzhi) <Li.Ryland@epa.gov>

Subject: Notice of availability of our statutory interpretation in the RFS program

<https://www.gpo.gov/fdsys/pkg/FR-2017-12-12/pdf/2017-26422.pdf>



**To:** Lamason, Bill[Lamason.Bill@epa.gov]; Dalcher, Debra[dalcher.debra@epa.gov]  
**Cc:** Jordan, Scott[Jordan.Scott@epa.gov]  
**From:** Rodman, Sonja  
**Sent:** Thur 1/25/2018 1:59:47 PM  
**Subject:** Once-In-Always-In Guidance Memorandum  
OIAI.Memo. Reclassification of Major Sources as Area Sources Under Section  
112\_2018\_01\_24\_Draft\_Justin OGC 1.25.18.docx

# Ex. 5 - Attorney Client

Sonja L. Rodman

Air Toxics, Consumer Protection and Indoor Air Practice Group

(202) 564-4079

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**To:** Jordan, Scott[Jordan.Scott@epa.gov]  
**Cc:** Dalcher, Debra[dalcher.debra@epa.gov]; Lamason, Bill[Lamason.Bill@epa.gov]  
**From:** Dalcher, Debra  
**Sent:** Fri 1/19/2018 12:04:05 AM  
**Subject:** Revised Memo post Marlow Meeting  
[OIAI.Revised OIAI memorandum.SJJ.DD.1.18.18.Sent to OAQPS.docx](#)

# Ex. 5 - Attorney Client

Thank you, Debra

**To:** Dalcher, Debra[dalcher.debra@epa.gov]  
**From:** Teal, Kim  
**Sent:** Mon 12/4/2017 7:16:42 PM  
**Subject:** FW: Revised OIAI Examples 12 3 17.docx  
Revised OIAI Examples 12 3 17.docx

Debra,

## Ex. 5 - Deliberative Process

**From:** Barnett, Keith  
**Sent:** Monday, December 04, 2017 8:09 AM  
**To:** Teal, Kim <Teal.Kim@epa.gov>  
**Subject:** FW: Revised OIAI Examples 12 3 17.docx  
**Importance:** High

Let Debra know if you have comments.

Keith Barnett

Minerals and Manufacturing Group Leader

919-541-5605

**From:** Dalcher, Debra  
**Sent:** Monday, December 04, 2017 8:07 AM  
**To:** Lassiter, Penny <Lassiter.Penny@epa.gov>; Barnett, Keith <Barnett.Keith@epa.gov>  
**Cc:** Dalcher, Debra <dalcher.debra@epa.gov>; Lamason, Bill <Lamason.Bill@epa.gov>  
**Subject:** Revised OIAI Examples 12 3 17.docx  
**Importance:** High

Penny, Keith

Attached are the current examples included in the OIAI memo. Please let me know if you would recommend any changes and confirm that the information provided is an accurate representation.

We are reviewing the memo with Peter later this morning.

Thank you, Debra

**To:** Dalcher, Debra[dalcher.debra@epa.gov]  
**From:** Jordan, Scott  
**Sent:** Tue 1/9/2018 4:27:49 PM  
**Subject:** Re: OIAI Rulemaking Docket

# Ex. 5 - Attorney Client

Scott Jordan

Air and Radiation Law Office

Office of General Counsel

202-564-7508

---

**From:** Dalcher, Debra  
**Sent:** Tuesday, January 9, 2018 11:24 AM  
**To:** Jordan, Scott  
**Subject:** RE: OIAI Rulemaking Docket

Okay, thanks. It is that part of my brain that is a planner that keeps trying to take over..... D

**From:** Jordan, Scott  
**Sent:** Tuesday, January 09, 2018 11:22 AM  
**To:** Dalcher, Debra <dalcher.debra@epa.gov>  
**Subject:** Re: OIAI Rulemaking Docket

# Ex. 5 - Attorney Client

# Ex. 5 - Attorney Client

Scott Jordan

Air and Radiation Law Office

Office of General Counsel

202-564-7508

---

**From:** Dalcher, Debra  
**Sent:** Tuesday, January 9, 2018 11:12 AM  
**To:** Jordan, Scott  
**Subject:** OIAI Rulemaking Docket

Scott,

# Ex. 5 - Attorney Client

If you are not the right person to ask, please let me know.

Thanks, Debra

Debra S. Dalcher

U.S. EPA

Policy and Strategies Group

Sector Policies and Programs Division, OAQPS

109 T.W. Alexander Drive

Research Triangle Park, NC 27711

Phone: 919-541-2443

**To:** Harlow, David[harlow.david@epa.gov]  
**Cc:** Jordan, Scott[Jordan.Scott@epa.gov]; Dalcher, Debra[dalcher.debra@epa.gov]  
**From:** Dalcher, Debra  
**Sent:** Wed 1/24/2018 2:44:31 PM  
**Subject:** NRDC Comments & Proposed Language  
[Comment National Resources Defence Council \(NRDC\) May 4 2007 \(1\).pdf](#)

**From:** Jordan, Scott  
**Sent:** Wednesday, January 24, 2018 9:01 AM  
**To:** Dalcher, Debra <dalcher.debra@epa.gov>  
**Cc:** Lamason, Bill <Lamason.Bill@epa.gov>; Culligan, Kevin <Culligan.Kevin@epa.gov>; Rodman, Sonja <Rodman.Sonja@epa.gov>  
**Subject:** OIAO - Possible revision

**Ex. 5 - Attorney Client**

**Ex. 5 - Attorney Client**

Scott Jordan

Air and Radiation Law Office

Office of General Counsel

202-564-7508



**From:** Dalcher, Debra  
**Sent:** Monday, January 22, 2018 3:56 PM  
**To:** Jordan, Scott <[Jordan.Scott@epa.gov](mailto:Jordan.Scott@epa.gov)>  
**Cc:** Dalcher, Debra <[dalcher.debra@epa.gov](mailto:dalcher.debra@epa.gov)>; Lamason, Bill <[Lamason.Bill@epa.gov](mailto:Lamason.Bill@epa.gov)>; Culligan, Kevin <[Culligan.Kevin@epa.gov](mailto:Culligan.Kevin@epa.gov)>; Rodman, Sonja <[Rodman.Sonja@epa.gov](mailto:Rodman.Sonja@epa.gov)>  
**Subject:** RE: Reclassification of Major Sources as Area Sources Under Section 112\_Draft\_1 22 18\_1pm.docx

Scott,

## Ex. 5 - Attorney Client

That is the last of Kevin's comments. None from Penny yet.

Thank you, Debra

**From:** Dalcher, Debra  
**Sent:** Monday, January 22, 2018 3:02 PM  
**To:** Jordan, Scott <[Jordan.Scott@epa.gov](mailto:Jordan.Scott@epa.gov)>  
**Cc:** Dalcher, Debra <[dalcher.debra@epa.gov](mailto:dalcher.debra@epa.gov)>  
**Subject:** Reclassification of Major Sources as Area Sources Under Section 112\_Draft\_1 22 18\_1pm.docx

Scott, see attached.

# **Ex. 5 - Attorney Client**

Debra

**To:** Rodman, Sonja[Rodman.Sonja@epa.gov]; Dalcher, Debra[dalcher.debra@epa.gov]  
**From:** Jordan, Scott  
**Sent:** Mon 1/22/2018 6:09:38 PM  
**Subject:** OIAO - Example of FR Notice from Sonja  
[2017-26422.pdf](#)  
[FRN OIAI Guidance Memorandum 1\\_19\\_18+SJJ 1.22.18.docx](#)

# Ex. 5 - Attorney Client

Scott Jordan  
Air and Radiation Law Office  
Office of General Counsel  
202-564-7508

-----Original Message-----

**From:** Rodman, Sonja  
**Sent:** Monday, January 22, 2018 12:42 PM  
**To:** Jordan, Scott <Jordan.Scott@epa.gov>  
**Subject:** FW: Notice of availability of our statutory interpretation in the RFS program

## Ex. 5 - Attorney Client

Sonja L. Rodman  
Air Toxics, Consumer Protection and Indoor Air Practice Group  
(202) 564-4079

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-----Original Message-----

**From:** Orlin, David  
**Sent:** Monday, January 22, 2018 12:34 PM  
**To:** Rodman, Sonja <Rodman.Sonja@epa.gov>  
**Cc:** Li, Ryland (Shengzhi) <Li.Ryland@epa.gov>  
**Subject:** Notice of availability of our statutory interpretation in the RFS program

<https://www.gpo.gov/fdsys/pkg/FR-2017-12-12/pdf/2017-26422.pdf>



**To:** Dalcher, Debra[dalcher.debra@epa.gov]  
**From:** Jordan, Scott  
**Sent:** Tue 1/9/2018 4:22:14 PM  
**Subject:** Re: OIAI Rulemaking Docket

# Ex. 5 - Attorney Client

Scott Jordan

Air and Radiation Law Office

Office of General Counsel

202-564-7508

---

**From:** Dalcher, Debra  
**Sent:** Tuesday, January 9, 2018 11:12 AM  
**To:** Jordan, Scott  
**Subject:** OIAI Rulemaking Docket

Scott,

# Ex. 5 - Attorney Client

If you are not the right person to ask, please let me know.

Thanks, Debra

Debra S. Dalcher

U.S. EPA

Policy and Strategies Group

Sector Policies and Programs Division, OAQPS

109 T.W. Alexander Drive

Research Triangle Park, NC 27711

Phone: 919-541-2443

**To:** Rodman, Sonja[Rodman.Sonja@epa.gov]; Dalcher, Debra[dalcher.debra@epa.gov]  
**Cc:** Vetter, Rick[Vetter.Rick@epa.gov]  
**From:** Jordan, Scott  
**Sent:** Mon 12/4/2017 5:54:30 PM  
**Subject:** RE: OIAI Draft Memo - Sonja's Comments and two thoughts by Scott  
[OIAI 12.4.17 0800 DD+SJJ 12.4.17slr.docx](#)

# Ex. 5 - Attorney Client

Scott Jordan

Air and Radiation Law Office

Office of General Counsel

202-564-7508

**From:** Rodman, Sonja  
**Sent:** Monday, December 04, 2017 12:40 PM  
**To:** Jordan, Scott <Jordan.Scott@epa.gov>; Dalcher, Debra <dalcher.debra@epa.gov>  
**Cc:** Vetter, Rick <Vetter.Rick@epa.gov>  
**Subject:** RE: OIAI Draft Memo - Two corrections to comments

A few suggested edits from me.

Sonja L. Rodman

Air Toxics, Consumer Protection and Indoor Air Practice Group

(202) 564-4079

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**From:** Jordan, Scott

**Sent:** Monday, December 04, 2017 9:28 AM

**To:** Dalcher, Debra <[dalcher.debra@epa.gov](mailto:dalcher.debra@epa.gov)>

**Cc:** Vetter, Rick <[Vetter.Rick@epa.gov](mailto:Vetter.Rick@epa.gov)>; Rodman, Sonja <[Rodman.Sonja@epa.gov](mailto:Rodman.Sonja@epa.gov)>

**Subject:** OIAI Draft Memo - Two corrections to comments

Debra –

**Ex. 5 - Attorney Client**

Scott Jordan

Air and Radiation Law Office



Office of General Counsel

202-564-7508

**From:** Dalcher, Debra

**Sent:** Monday, December 04, 2017 8:44 AM

**To:** Lamason, Bill <[Lamason.Bill@epa.gov](mailto:Lamason.Bill@epa.gov)>; French, Chuck <[French.Chuck@epa.gov](mailto:French.Chuck@epa.gov)>; McLamb, Marguerite <[McLamb.Marguerite@epa.gov](mailto:McLamb.Marguerite@epa.gov)>; Culligan, Kevin <[Culligan.Kevin@epa.gov](mailto:Culligan.Kevin@epa.gov)>; Vetter, Rick <[Vetter.Rick@epa.gov](mailto:Vetter.Rick@epa.gov)>; Jordan, Scott <[Jordan.Scott@epa.gov](mailto:Jordan.Scott@epa.gov)>

**Cc:** Dalcher, Debra <[dalcher.debra@epa.gov](mailto:dalcher.debra@epa.gov)>

**Subject:** OIAI\_12.4.17 0800 DD.docx

**Importance:** High

Good Morning Everyone,

Attached is the current version of the memo.

Outstanding Issues:

## **Ex. 5 - Attorney Client/Deliberative Process**

Please send comments/edits if you have them.... we have an update meeting with Peter today at 1PM.

Thank you, Debra



**To:** Jordan, Scott[Jordan.Scott@epa.gov]  
**From:** Dalcher, Debra  
**Sent:** Thur 1/25/2018 1:31:49 PM  
**Subject:** FW: Examples as Requested

Just FYI Scott,

## Ex. 5 - Attorney Client

Debra

**From:** Lamason, Bill  
**Sent:** Wednesday, January 24, 2018 3:25 PM  
**To:** Cortelyou-Lee, Jan <Cortelyou-Lee.Jan@epa.gov>; Dalcher, Debra <dalcher.debra@epa.gov>  
**Subject:** RE: Examples as Requested

Jan, I'm responding for Debra as she's pulling together the blue folder.

## Ex. 5 - Deliberative Process

## Ex. 5 - Deliberative Process

## Ex. 5 - Deliberative Process

Let us know if you have any questions.

Bill

**From:** Cortelyou-Lee, Jan  
**Sent:** Wednesday, January 24, 2018 3:04 PM  
**To:** Dalcher, Debra <[dalcher.debra@epa.gov](mailto:dalcher.debra@epa.gov)>  
**Cc:** Lamason, Bill <[Lamason.Bill@epa.gov](mailto:Lamason.Bill@epa.gov)>  
**Subject:** RE: Examples as Requested

Thanks Debra

## Ex. 5 - Deliberative Process

Jan Cortelyou-Lee

US Environmental Protection Agency

Office of Air Quality Planning and Standards

MD-C404-03

109 TW Alexander Drive

Research Triangle Park, NC 27709

Desk: 919-541-5393

Cell: 919-368-5734

**From:** Dalcher, Debra

**Sent:** Wednesday, January 24, 2018 12:08 PM

**To:** Cortelyou-Lee, Jan <[Cortelyou-Lee.Jan@epa.gov](mailto:Cortelyou-Lee.Jan@epa.gov)>

**Cc:** Lamason, Bill <[Lamason.Bill@epa.gov](mailto:Lamason.Bill@epa.gov)>

**Subject:** Examples as Requested

Thanks Jan. If you need anything else, please don't hesitate to reach out.

Debra

## Ex. 5 - Deliberative Process

# **Ex. 5 - Deliberative Process**

Debra S. Dalcher

U.S. EPA

Policy and Strategies Group

Sector Policies and Programs Division, OAQPS

109 T.W. Alexander Drive

Research Triangle Park, NC 27711

Phone: 919-541-2443

**To:** Jordan, Scott[Jordan.Scott@epa.gov]; Dalcher, Debra[dalcher.debra@epa.gov]  
**Cc:** Lamason, Bill[Lamason.Bill@epa.gov]  
**From:** Rodman, Sonja  
**Sent:** Mon 1/22/2018 2:29:06 PM  
**Subject:** RE: OIAI Revision -

**Ex. 5 - Attorney- Client/Deliberative Process**

**Ex. 5 - Attorney- Client/Deliberative Process**

Sonja L. Rodman

Air Toxics, Consumer Protection and Indoor Air Practice Group

(202) 564-4079

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**From:** Jordan, Scott  
**Sent:** Monday, January 22, 2018 9:05 AM  
**To:** Dalcher, Debra <dalcher.debra@epa.gov>  
**Cc:** Lamason, Bill <Lamason.Bill@epa.gov>; Rodman, Sonja <Rodman.Sonja@epa.gov>  
**Subject:** OIAI Revision -

**Ex. 5 - Attorney- Client/Deliberative Process**

**Ex. 5 - Attorney- Client/Deliberative Process**

## Ex. 5 - Attorney- Client/Deliberative Process

Scott Jordan

Air and Radiation Law Office

Office of General Counsel

202-564-7508

**From:** Dalcher, Debra

**Sent:** Friday, January 19, 2018 3:41 PM

**To:** Jordan, Scott <[Jordan.Scott@epa.gov](mailto:Jordan.Scott@epa.gov)>

**Cc:** Dalcher, Debra <[dalcher.debra@epa.gov](mailto:dalcher.debra@epa.gov)>; Lamason, Bill <[Lamason.Bill@epa.gov](mailto:Lamason.Bill@epa.gov)>

**Subject:** Addressed Sonja's Comments

## Ex. 5 - Attorney Client

Scott,

## Ex. 5 - Attorney Client

Thank you, Debra

---

**From:** Jordan, Scott

**Sent:** Friday, January 19, 2018 3:06 PM

**To:** Dalcher, Debra

**Subject:** Fw: just a couple minor comments



## **Ex. 5 - Attorney- Client/Deliberative Process**

### **Ex. 6 - Personal Privacy**

Scott Jordan

Air and Radiation Law Office

Office of General Counsel

202-564-7508

---

**From:** Rodman, Sonja

**Sent:** Friday, January 19, 2018 1:42 PM

**To:** Jordan, Scott

**Subject:** just a couple minor comments

## **Ex. 5 - Attorney Client /Deliberative Process**

Sonja L. Rodman

Air Toxics, Consumer Protection and Indoor Air Practice Group

(202) 564-4079

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**To:** Dalcher, Debra[dalcher.debra@epa.gov]  
**Cc:** Vetter, Rick[Vetter.Rick@epa.gov]; Rodman, Sonja[Rodman.Sonja@epa.gov]  
**From:** Jordan, Scott  
**Sent:** Mon 12/4/2017 5:41:30 PM  
**Subject:** OIAI Memo

**Ex. 5 - Attorney Client**

**Ex. 5 - Attorney Client**

OIAI\_12.4.17 0800 DD+RHV.DOCX

**Ex. 5 - Attorney Client**

**Ex. 5 - Attorney Client**

Scott Jordan

Air and Radiation Law Office

Office of General Counsel

202-564-7508

**From:** Dalcher, Debra  
**Sent:** Monday, December 04, 2017 12:33 PM  
**To:** Jordan, Scott <Jordan.Scott@epa.gov>  
**Subject:** OIAI\_12.4.17 0800 DD+RHV.DOCX

Scott, see Rick's edits to the first paragraph of the memo. Any comments, changes?

Thank you, Debra

**To:** Barnett, Keith[Barnett.Keith@epa.gov]; Dalcher, Debra[dalcher.debra@epa.gov]; Lassiter, Penny[Lassiter.Penny@epa.gov]  
**From:** Eddinger, Jim  
**Sent:** Thur 11/16/2017 3:55:01 PM  
**Subject:** RE: Current version of the examples in the draft OIAI memo - Comment today if possible

It looks fine to me,

Jim

James Eddinger

Energy Strategies Group

Sector Policies and Programs Division

919-541-5426

too.

**From:** Barnett, Keith  
**Sent:** Thursday, November 16, 2017 9:45 AM  
**To:** Dalcher, Debra <dalcher.debra@epa.gov>; Lassiter, Penny <Lassiter.Penny@epa.gov>; Eddinger, Jim <Eddinger.Jim@epa.gov>  
**Subject:** RE: Current version of the examples in the draft OIAI memo - Comment today if possible

This looks fine to me.

Keith Barnett

Minerals and Manufacturing Group Leader

919-541-5605

**From:** Dalcher, Debra

**Sent:** Thursday, November 16, 2017 7:37 AM

**To:** Lassiter, Penny <[Lassiter.Penny@epa.gov](mailto:Lassiter.Penny@epa.gov)>; Eddinger, Jim <[Eddinger.Jim@epa.gov](mailto:Eddinger.Jim@epa.gov)>;  
Barnett, Keith <[Barnett.Keith@epa.gov](mailto:Barnett.Keith@epa.gov)>

**Subject:** Current version of the examples in the draft OIAI memo - Comment today if possible

## Ex. 5 - Deliberative Process

Thank you, Debra

Debra S. Dalcher

U.S. EPA

Policy and Strategies Group

Sector Policies and Programs Division, OAQPS

109 T.W. Alexander Drive

Research Triangle Park, NC 27711

Phone: 919-541-2443

**To:** Jordan, Scott[Jordan.Scott@epa.gov]  
**Cc:** Lamason, Bill[Lamason.Bill@epa.gov]; Rodman, Sonja[Rodman.Sonja@epa.gov]  
**From:** Dalcher, Debra  
**Sent:** Mon 1/22/2018 2:07:48 PM  
**Subject:** RE: OIAI Revision -

## **Ex. 5 - Attorney-Client/Deliberative Process**

Good Morning Scott, thank you.

## **Ex. 5 - Attorney-Client/Deliberative Process**

Debra

**From:** Jordan, Scott  
**Sent:** Monday, January 22, 2018 9:05 AM  
**To:** Dalcher, Debra <dalcher.debra@epa.gov>  
**Cc:** Lamason, Bill <Lamason.Bill@epa.gov>; Rodman, Sonja <Rodman.Sonja@epa.gov>  
**Subject:** OIAI Revision - Addressed Sonja's Comments w/1 exception re "effective immediately"

## **Ex. 5 - Attorney-Client/Deliberative Process**



Scott Jordan

Air and Radiation Law Office

Office of General Counsel

202-564-7508

**From:** Dalcher, Debra

**Sent:** Friday, January 19, 2018 3:41 PM

**To:** Jordan, Scott <[Jordan.Scott@epa.gov](mailto:Jordan.Scott@epa.gov)>

**Cc:** Dalcher, Debra <[dalcher.debra@epa.gov](mailto:dalcher.debra@epa.gov)>; Lamason, Bill <[Lamason.Bill@epa.gov](mailto:Lamason.Bill@epa.gov)>

**Subject:**

**Ex. 5 - Attorney-Client/Deliberative Process**

Scott,

**Ex. 5 - Attorney Client**

Thank you, Debra

---

**From:** Jordan, Scott

**Sent:** Friday, January 19, 2018 3:06 PM

**To:** Dalcher, Debra

**Subject:** Fw: just a couple minor comments

**Ex. 5 - Attorney-Client/Deliberative Process**

## Ex. 5 - Attorney-Client/Deliberative Process

### Ex. 6 - Personal Privacy

Scott Jordan

Air and Radiation Law Office

Office of General Counsel

202-564-7508

---

**From:** Rodman, Sonja  
**Sent:** Friday, January 19, 2018 1:42 PM  
**To:** Jordan, Scott  
**Subject:** just a couple minor comments

## Ex. 5 - Attorney Client

Sonja L. Rodman

Air Toxics, Consumer Protection and Indoor Air Practice Group

(202) 564-4079

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*under FOIA without appropriate review. If you are not the intended recipient, or the employee or agent responsible to deliver it to the intended recipient, please contact the sender and delete all copies.*

**To:** Lamason, Bill[Lamason.Bill@epa.gov]  
**Cc:** Thompson, Fred[Thompson.Fred@epa.gov]; Torres, Elineth[Torres.Elineth@epa.gov];  
Dalcher, Debra[dalcher.debra@epa.gov]  
**From:** Johnson, Yvonne W  
**Sent:** Thur 11/2/2017 12:25:09 PM  
**Subject:** RE: need your assistance for AFPM-EPA Nov 2 Meeting

Sounds good. thank you.

---

Thank you,

**Yvonne W. Johnson**

Special Assistant to the Director

Air Quality Policy Division

Office of Air Quality Planning & Standards

U.S. Environmental Protection Agency

919-541-3921

johnson.yvonnew@epa.gov

**From:** Lamason, Bill  
**Sent:** Thursday, November 02, 2017 8:25 AM  
**To:** Johnson, Yvonne W <Johnson.Yvonnew@epa.gov>  
**Cc:** Thompson, Fred <Thompson.Fred@epa.gov>; Torres, Elineth <Torres.Elineth@epa.gov>;  
Dalcher, Debra <dalcher.debra@epa.gov>  
**Subject:** RE: need your assistance for AFPM-EPA Nov 2 Meeting

Yvonne,

After checking with Elineth, we have to beg off the meeting. Due to the short notice we're unable to send anyone. However, we are interested in their input so if they bring up OIAI, here's a few talking points.

## Ex. 5 - Deliberative Process

Thanks!

Bill

**From:** Johnson, Yvonne W

**Sent:** Wednesday, November 01, 2017 4:06 PM

**To:** Lamason, Bill <[Lamason.Bill@epa.gov](mailto:Lamason.Bill@epa.gov)>

**Cc:** Thompson, Fred <[Thompson.Fred@epa.gov](mailto:Thompson.Fred@epa.gov)>; Torres, Elineth <[Torres.Elineth@epa.gov](mailto:Torres.Elineth@epa.gov)>;

Dalcher, Debra <[dalcher.debra@epa.gov](mailto:dalcher.debra@epa.gov)>

**Subject:** RE: need your assistance for AFPM-EPA Nov 2 Meeting

I totally understand and I told them that I could not guarantee your availability since they just submitted those topics today. I will wait to hear back from you.

Thank you,

**Yvonne W. Johnson**

Special Assistant to the Director

Air Quality Policy Division

Office of Air Quality Planning & Standards

U.S. Environmental Protection Agency

919-541-3921

[johnson.yvonnew@epa.gov](mailto:johnson.yvonnew@epa.gov)

**From:** Lamason, Bill

**Sent:** Wednesday, November 01, 2017 4:01 PM

**To:** Johnson, Yvonne W <[Johnson.Yvonnew@epa.gov](mailto:Johnson.Yvonnew@epa.gov)>

**Cc:** Thompson, Fred <[Thompson.Fred@epa.gov](mailto:Thompson.Fred@epa.gov)>; Torres, Elineth <[Torres.Elineth@epa.gov](mailto:Torres.Elineth@epa.gov)>;  
Dalcher, Debra <[dalcher.debra@epa.gov](mailto:dalcher.debra@epa.gov)>

**Subject:** FW: need your assistance for AFPM-EPA Nov 2 Meeting

**Importance:** High

Yvonne,

Fred forwarded your request to me as my group is on point for Once-in-Always-in. I will need to connect with Elineth Torres in the morning to see if we can sit in and listen to their input at 11:30 am tomorrow.

**Ex. 5 - Deliberative Process**

**Ex. 5 - Deliberative Process**

**Ex. 5 - Deliberative Process**

We also have nothing we can offer on the other two topics on short notice.

Once I circle with Elineth in the morning we'll confirm our availability and who will attend for the Once-in-Always-In topic.

Thanks!

Bill

**From:** Thompson, Fred  
**Sent:** Wednesday, November 01, 2017 3:45 PM  
**To:** Lamason, Bill <[Lamason.Bill@epa.gov](mailto:Lamason.Bill@epa.gov)>  
**Subject:** FW: need your assistance for AFPM-EPA Nov 2 Meeting  
**Importance:** High

Bill – Sent per our conversation. Thanks! Fred

**Frederick J. Thompson**

**Associate Director**

**Sector Policies & Programs Division**

**U.S. EPA, RTP, NC 27711**

**919.541.2707**

**From:** Johnson, Yvonne W  
**Sent:** Wednesday, November 01, 2017 12:53 PM  
**To:** Thompson, Fred <[Thompson.Fred@epa.gov](mailto:Thompson.Fred@epa.gov)>  
**Subject:** need your assistance for AFPM-EPA Nov 2 Meeting  
**Importance:** High

## Ex. 5 - Deliberative Process

Attendees:

<u>Name</u>	<u>Company</u>
David Friedman	AFPM
Matthew Hodges	Valero Energy
Michael Hopperton	BP
David Pavlich	Phillips 66

---

Thank you,

**Yvonne W. Johnson**

Special Assistant to the Director

Air Quality Policy Division

Office of Air Quality Planning & Standards

U.S. Environmental Protection Agency

919-541-3921

[johnson.yvonnew@epa.gov](mailto:johnson.yvonnew@epa.gov)





**To:** Dalcher, Debra[dalcher.debra@epa.gov]  
**From:** Dalcher, Debra  
**Sent:** Thur 1/18/2018 8:11:39 PM  
**Subject:** Fw: OIAI

**Ex. 5 - Attorney-Client/Deliberative Process**

---

**From:** Dalcher, Debra  
**Sent:** Thursday, January 18, 2018 3:04 PM  
**To:** Jordan, Scott  
**Cc:** Rodman, Sonja  
**Subject:** Re: OIAI -

**Ex. 5 - Attorney-Client/Deliberative Process**

**Ex. 5 - Attorney-Client/Deliberative Process**

---

**From:** Jordan, Scott  
**Sent:** Thursday, January 18, 2018 2:55:22 PM  
**To:** Dalcher, Debra  
**Cc:** Rodman, Sonja  
**Subject:** OIAI -

**Ex. 5 - Attorney-Client/Deliberative Process**

Dabra –

**Ex. 5 - Attorney-Client/Deliberative Process**

Scott Jordan

Air and Radiation Law Office

Office of General Counsel

202-564-7508

**From:** Dalcher, Debra

**Sent:** Thursday, January 18, 2018 2:40 PM

**To:** Jordan, Scott <Jordan.Scott@epa.gov>

**Subject:** Re: OIAI - Scott Comments on OIAI Memo (Subject to Today's Meeting)

## **Ex. 5 - Attorney-Client/Deliberative Process**

---

**From:** Jordan, Scott

**Sent:** Thursday, January 18, 2018 11:28:18 AM

**To:** Dalcher, Debra

**Cc:** Rodman, Sonja

**Subject:** OIAI - Scott Comments on OIAI Memo (Subject to Today's Meeting)

Debra –

## **Ex. 5 - Attorney-Client/Deliberative Process**

Scott Jordan

Air and Radiation Law Office

Office of General Counsel

202-564-7508

**To:** Lamason, Bill[Lamason.Bill@epa.gov]; Torres, Elineth[Torres.Elineth@epa.gov]; Dalcher, Debra[dalcher.debra@epa.gov]  
**From:** Dalcher, Debra  
**Sent:** Mon 11/13/2017 4:53:28 PM  
**Subject:** OIAI PP Examples

## **Ex. 5 - Deliberative Process**

Debra S. Dalcher

U.S. EPA

Policy and Strategies Group

Sector Policies and Programs Division, OAQPS

109 T.W. Alexander Drive

Research Triangle Park, NC 27711

Phone: 919-541-2443

**To:** Dalcher, Debra[dalcher.debra@epa.gov]  
**From:** Eck, Janet  
**Sent:** Wed 1/31/2018 12:00:28 AM  
**Subject:** RE: OIAI Reg Agenda Entry.docx

## Ex. 5 - Deliberative Process

**From:** Dalcher, Debra  
**Sent:** Monday, January 29, 2018 2:36 PM  
**To:** Eck, Janet <Eck.Janet@epa.gov>  
**Cc:** Dalcher, Debra <dalcher.debra@epa.gov>  
**Subject:** OIAI Reg Agenda Entry.docx

Janet,

## Ex. 5 - Deliberative Process

Thank you, Debra

**To:** Lassiter, Penny[Lassiter.Penny@epa.gov]; Eddinger, Jim[Eddinger.Jim@epa.gov]; Barnett, Keith[Barnett.Keith@epa.gov]  
**From:** Dalcher, Debra  
**Sent:** Thur 11/16/2017 12:37:19 PM  
**Subject:** Current version of the examples in the draft OIAI memo - Comment today if possible

## **Ex. 5 - Deliberative Process**

## **Ex. 5 - Deliberative Process**

Thank you, Debra

Debra S. Dalcher

U.S. EPA

Policy and Strategies Group

Sector Policies and Programs Division, OAQPS

109 T.W. Alexander Drive

Research Triangle Park, NC 27711

Phone: 919-541-2443



**To:** Dalcher, Debra[dalcher.debra@epa.gov]  
**From:** Lamason, Bill  
**Sent:** Thur 11/30/2017 5:11:20 PM  
**Subject:** RE: first cut at revising OIAI memo - Scott's comments

OK. I am out of the meeting. Should I go to Marguerite's office or just wait for you to call me when you are off? Have update on informational briefing on approaches for Wehrum that we need to give before the holidays. Bill

**From:** Dalcher, Debra  
**Sent:** Thursday, November 30, 2017 11:58 AM  
**To:** Lamason, Bill <Lamason.Bill@epa.gov>  
**Subject:** Fw: first cut at revising OIAI memo - Scott's comments

FYI. Debra

---

**From:** McLamb, Marguerite  
**Sent:** Thursday, November 30, 2017 11:29 AM  
**To:** Dalcher, Debra  
**Subject:** FW: first cut at revising OIAI memo - Scott's comments

FYI, below. I just wrapped up meetings and will call in about 10 minutes.

**From:** Jordan, Scott  
**Sent:** Thursday, November 30, 2017 11:19 AM  
**To:** Vetter, Rick <Vetter.Rick@epa.gov>; Rodman, Sonja <Rodman.Sonja@epa.gov>  
**Cc:** Versace, Paul <Versace.Paul@epa.gov>; McLamb, Marguerite <McLamb.Marguerite@epa.gov>  
**Subject:** Re: first cut at revising OIAI memo - Scott's comments

Thanks.

## **Ex. 5 - Attorney-Client/Deliberative Process**

Scott Jordan

Air and Radiation Law Office

Office of General Counsel

202-564-7508

---

**From:** Vetter, Rick

**Sent:** Thursday, November 30, 2017 10:58 AM

**To:** Jordan, Scott; Rodman, Sonja

**Cc:** Versace, Paul; McLamb, Marguerite

**Subject:** RE: first cut at revising OIAI memo - Scott's comments

## **Ex. 5 - Attorney Client**

## **Ex. 5 - Attorney-Client/Deliberative Process**

Rick

Richard H. Vetter

Richard H. Vetter

Attorney Advisor

Air & Radiation Law Office

Office of General Counsel

[vetter.rick@epa.gov](mailto:vetter.rick@epa.gov)

919-541-2127

**From:** Jordan, Scott

**Sent:** Thursday, November 30, 2017 8:43 AM

**To:** Rodman, Sonja <[Rodman.Sonja@epa.gov](mailto:Rodman.Sonja@epa.gov)>; Vetter, Rick <[Vetter.Rick@epa.gov](mailto:Vetter.Rick@epa.gov)>

**Cc:** Versace, Paul <[Versace.Paul@epa.gov](mailto:Versace.Paul@epa.gov)>; McLamb, Marguerite  
<[McLamb.Marguerite@epa.gov](mailto:McLamb.Marguerite@epa.gov)>

**Subject:** Re: first cut at revising OIAI memo - Scott's comments

## Ex. 5 - Attorney-Client/Deliberative Process

## Ex. 5 - Attorney-Client/Deliberative Process

Scott Jordan

Air and Radiation Law Office

Office of General Counsel

Ex. 6 - Personal Privacy

---

**From:** Rodman, Sonja  
**Sent:** Tuesday, November 28, 2017 5:16 PM  
**To:** Vetter, Rick; Jordan, Scott  
**Cc:** Versace, Paul  
**Subject:** FW: first cut at revising OIAI memo

## Ex. 5 - Attorney-Client/Deliberative Process

Sonja L. Rodman  
Air Toxics, Consumer Protection and Indoor Air Practice Group  
(202) 564-4079

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**To:** Vetter, Rick[Vetter.Rick@epa.gov]  
**Cc:** Lamason, Bill[Lamason.Bill@epa.gov]; Dalcher, Debra[dalcher.debra@epa.gov]  
**From:** Torres, Elineth  
**Sent:** Wed 11/1/2017 1:03:38 PM  
**Subject:** RE: OIAI Check-in  
[OIAI Options Pager 10 30 17.docx](#)

Here is the document. No, I have not received any comments/edits from the other WG members.

Elineth Torres

OAQPS

919-541-4347

**From:** Vetter, Rick  
**Sent:** Wednesday, November 01, 2017 9:01 AM  
**To:** Torres, Elineth <Torres.Elineth@epa.gov>  
**Subject:** RE: OIAI Check-in

Elineth,

Please send me the latest iteration of the document. I probably have it, but I want to be sure I'm looking at the latest. Did you receive any comments from the other members of the workgroup? Thanks.

Rick

Richard H. Vetter

Richard H. Vetter

Attorney Advisor

Air & Radiation Law Office

Office of General Counsel

[vetter.rick@epa.gov](mailto:vetter.rick@epa.gov)

919-541-2127

**From:** Torres, Elineth

**Sent:** Wednesday, November 01, 2017 8:30 AM

**To:** Rodman, Sonja <[Rodman.Sonja@epa.gov](mailto:Rodman.Sonja@epa.gov)>

**Cc:** Vetter, Rick <[Vetter.Rick@epa.gov](mailto:Vetter.Rick@epa.gov)>; Lamason, Bill <[Lamason.Bill@epa.gov](mailto:Lamason.Bill@epa.gov)>; Dalcher, Debra <[dalcher.debra@epa.gov](mailto:dalcher.debra@epa.gov)>

**Subject:** RE: OIAI Check-in

Sonja,

## Ex. 6 - Personal Privacy

We will have our meeting at 10AM and move forward with the input we get from Rick. We will circle back with you once you are in the office.

Thanks,

Elineth Torres

OAQPS

919-541-4347

**From:** Torres, Elineth  
**Sent:** Wednesday, November 01, 2017 7:54 AM  
**To:** Rodman, Sonja <[Rodman.Sonja@epa.gov](mailto:Rodman.Sonja@epa.gov)>  
**Cc:** Vetter, Rick <[Vetter.Rick@epa.gov](mailto:Vetter.Rick@epa.gov)>; Lamason, Bill <[Lamason.Bill@epa.gov](mailto:Lamason.Bill@epa.gov)>; Dalcher, Debra <[dalcher.debra@epa.gov](mailto:dalcher.debra@epa.gov)>  
**Subject:** RE: OIAI Check-in

Sonja,

Please let us know by email if you have any comments/edits on the options pager or feedback from your management.

Thanks,

Elineth Torres

OAQPS

919-541-4347

-----Original Appointment-----

**From:** Rodman, Sonja  
**Sent:** Wednesday, November 01, 2017 7:08 AM  
**To:** Torres, Elineth  
**Subject:** Declined: OIAI Check-in  
**When:** Wednesday, November 01, 2017 10:00 AM-10:30 AM (UTC-05:00) Eastern Time (US & Canada).  
**Where:** Bill's Office



**To:** Dalcher, Debra[dalcher.debra@epa.gov]  
**From:** Lamason, Bill  
**Sent:** Thur 1/25/2018 4:17:07 PM  
**Subject:** RE: Draft Comms Plan for Today's Memo - Please Review ASAP

Thanks. Confirmed the 3 pm signature schedule by BW. B

**From:** Dalcher, Debra  
**Sent:** Thursday, January 25, 2018 11:16 AM  
**To:** Ashley, Jackie <Ashley.Jackie@epa.gov>; Lamason, Bill <Lamason.Bill@epa.gov>  
**Cc:** Mills, Kathy <Mills.Kathy@epa.gov>  
**Subject:** RE: Draft Comms Plan for Today's Memo - Please Review ASAP

Yes, it is in. We will be sending a final draft to OGC to make sure we have captured all of their edits this morning for a last quick review.

Thank you, Debra

**From:** Ashley, Jackie  
**Sent:** Thursday, January 25, 2018 11:15 AM  
**To:** Lamason, Bill <Lamason.Bill@epa.gov>  
**Cc:** Mills, Kathy <Mills.Kathy@epa.gov>; Dalcher, Debra <dalcher.debra@epa.gov>  
**Subject:** Re: Draft Comms Plan for Today's Memo - Please Review ASAP

That is going in the memo?

And will do. Thanks.

On Jan 25, 2018, at 11:13 AM, Lamason, Bill <Lamason.Bill@epa.gov> wrote:

The OAR IO may want to add a paragraph to the summary similar to this.  
Check with OAR comms.

## Ex. 5 - Deliberative Process

I'd follow OAR lead. Bill

**From:** Ashley, Jackie

**Sent:** Thursday, January 25, 2018 10:59 AM

**To:** Lamason, Bill <[Lamason.Bill@epa.gov](mailto:Lamason.Bill@epa.gov)>; Mills, Kathy <[Mills.Kathy@epa.gov](mailto:Mills.Kathy@epa.gov)>;  
Dalcher, Debra <[dalcher.debra@epa.gov](mailto:dalcher.debra@epa.gov)>

**Subject:** RE: Draft Comms Plan for Today's Memo - Please Review ASAP

Can you do a gut check for facts in the next 5 minutes? Especially if there's anything substantive we need to flag. The first page through the statement is the most important part.

We can chase edits if we need to. The urgency is we'd like to give it to the press office ASAP as they are drafting a press release.

-----  
Jackie Ashley - US EPA - Office of Air Quality Planning and Standards - 919-541-7664 –  
[ashley.jackie@epa.gov](mailto:ashley.jackie@epa.gov)

**From:** Lamason, Bill

**Sent:** Thursday, January 25, 2018 10:57 AM

**To:** Ashley, Jackie <[Ashley.Jackie@epa.gov](mailto:Ashley.Jackie@epa.gov)>; Mills, Kathy <[Mills.Kathy@epa.gov](mailto:Mills.Kathy@epa.gov)>;  
Dalcher, Debra <[dalcher.debra@epa.gov](mailto:dalcher.debra@epa.gov)>

**Subject:** RE: Draft Comms Plan for Today's Memo - Please Review ASAP

Looking at but multitasking with OAR on the memo. B

**From:** Ashley, Jackie  
**Sent:** Thursday, January 25, 2018 10:51 AM  
**To:** Cortelyou-Lee, Jan <[Cortelyou-Lee.Jan@epa.gov](mailto:Cortelyou-Lee.Jan@epa.gov)>; Mills, Kathy <[Mills.Kathy@epa.gov](mailto:Mills.Kathy@epa.gov)>; Dalcher, Debra <[dalcher.debra@epa.gov](mailto:dalcher.debra@epa.gov)>; Lamason, Bill <[Lamason.Bill@epa.gov](mailto:Lamason.Bill@epa.gov)>; DeLuca, Isabel <[DeLuca.Isabel@epa.gov](mailto:DeLuca.Isabel@epa.gov)>; Koerber, Mike <[Koerber.Mike@epa.gov](mailto:Koerber.Mike@epa.gov)>  
**Subject:** RE: Draft Comms Plan for Today's Memo - Please Review ASAP

Bill, Debra, KB –

Just checking on where you are in review.

-----  
Jackie Ashley - US EPA - Office of Air Quality Planning and Standards - 919-541-7664 –  
[ashley.jackie@epa.gov](mailto:ashley.jackie@epa.gov)

**From:** Cortelyou-Lee, Jan  
**Sent:** Thursday, January 25, 2018 10:02 AM  
**To:** Mills, Kathy <[Mills.Kathy@epa.gov](mailto:Mills.Kathy@epa.gov)>; Dalcher, Debra <[dalcher.debra@epa.gov](mailto:dalcher.debra@epa.gov)>; Lamason, Bill <[Lamason.Bill@epa.gov](mailto:Lamason.Bill@epa.gov)>; Ashley, Jackie <[Ashley.Jackie@epa.gov](mailto:Ashley.Jackie@epa.gov)>; DeLuca, Isabel <[DeLuca.Isabel@epa.gov](mailto:DeLuca.Isabel@epa.gov)>; Koerber, Mike <[Koerber.Mike@epa.gov](mailto:Koerber.Mike@epa.gov)>  
**Subject:** FW: Draft Comms Plan for Today's Memo - Please Review ASAP

**Ex. 6 - Personal Privacy**

Folks – Jackie will cover this for the rest of the day. Please send her your comments.

Jackie – this version includes a few comments in tracked changes from Mike.

Jan Cortelyou-Lee

US Environmental Protection Agency

Office of Air Quality Planning and Standards

MD-C404-03

109 TW Alexander Drive

Research Triangle Park, NC 27709

Desk: 919-541-5393

Cell: 919-368-5734

**From:** Koerber, Mike

**Sent:** Thursday, January 25, 2018 8:56 AM

**To:** Cortelyou-Lee, Jan <[Cortelyou-Lee.Jan@epa.gov](mailto:Cortelyou-Lee.Jan@epa.gov)>; Dalcher, Debra <[dalcher.debra@epa.gov](mailto:dalcher.debra@epa.gov)>; Lamason, Bill <[Lamason.Bill@epa.gov](mailto:Lamason.Bill@epa.gov)>

**Cc:** Mills, Kathy <[Mills.Kathy@epa.gov](mailto:Mills.Kathy@epa.gov)>

**Subject:** RE: Draft Comms Plan for Today's Memo - Please Review ASAP

Minor edits attached

**From:** Cortelyou-Lee, Jan

**Sent:** Thursday, January 25, 2018 8:42 AM

**To:** Dalcher, Debra <[dalcher.debra@epa.gov](mailto:dalcher.debra@epa.gov)>; Lamason, Bill <[Lamason.Bill@epa.gov](mailto:Lamason.Bill@epa.gov)>; Koerber, Mike <[Koerber.Mike@epa.gov](mailto:Koerber.Mike@epa.gov)>

**Cc:** Mills, Kathy <[Mills.Kathy@epa.gov](mailto:Mills.Kathy@epa.gov)>

**Subject:** Draft Comms Plan for Today's Memo - Please Review ASAP

This include KBs QAs (with some minor adjustments) and additional pieces I think we need. Debra will you share with OGC?

I understand the plan is signature around 2 and posting to the web – distribution at 3ish with a press release. If I get a draft of that to share, I will. OAR would like to share this doc for

press release fodder ASAP.

I will get something mocked up for the web with the ITG folks soon.

Jan Cortelyou-Lee

US Environmental Protection Agency

Office of Air Quality Planning and Standards

MD-C404-03

109 TW Alexander Drive

Research Triangle Park, NC 27709

Desk: 919-541-5393

Cell: 919-368-5734

**To:** Dunkins, Robin[Dunkins.Robin@epa.gov]  
**Cc:** Torres, Elineth[Torres.Elineth@epa.gov]; Dalcher, Debra[dalcher.debra@epa.gov]; Lamason, Bill[Lamason.Bill@epa.gov]  
**From:** Dalcher, Debra  
**Sent:** Wed 11/15/2017 6:21:10 PM  
**Subject:** Examples OIAI

Robin,

## Ex. 5 - Deliberative Process

Thank you much, Debra

**From:** Torres, Elineth  
**Sent:** Wednesday, November 15, 2017 1:17 PM  
**To:** Dalcher, Debra <dalcher.debra@epa.gov>  
**Subject:** examples OIAI

## Ex. 5 - Deliberative Process

# **Ex. 5 - Deliberative Process**

Elineth Torres

OAQPS

919-541-4347

**To:** Dalcher, Debra[dalcher.debra@epa.gov]  
**From:** Shrager, Brian  
**Sent:** Fri 1/19/2018 9:15:10 PM  
**Subject:** RE: RIA for OIAI Rule Package (either supplemental or new proposal)

**Ex. 6 - Personal Privacy**

I called her and left a message. so unless she calls me back in the next 15 minutes, it will have to wait.

**From:** Dalcher, Debra  
**Sent:** Friday, January 19, 2018 2:37 PM  
**To:** Shrager, Brian <Shrager.Brian@epa.gov>; Weatherhead, Darryl <Weatherhead.Darryl@epa.gov>  
**Cc:** Lamason, Bill <Lamason.Bill@epa.gov>  
**Subject:** Re: RIA for OIAI Rule Package (either supplemental or new proposal)

Brian, I spoke with Darryl and gave her a short overview. She mentioned giving you a call to discuss. If you have time to reach out it would probably be helpful.

Thank you, Debra

---

**From:** Shrager, Brian  
**Sent:** Friday, January 19, 2018 2:35 PM  
**To:** Weatherhead, Darryl; Dalcher, Debra  
**Cc:** Lamason, Bill  
**Subject:** RE: RIA for OIAI Rule Package (either supplemental or new proposal)

Once in Always In...the policy which will be rescinded.

**From:** Weatherhead, Darryl  
**Sent:** Friday, January 19, 2018 2:02 PM  
**To:** Dalcher, Debra <dalcher.debra@epa.gov>; Shrager, Brian <Shrager.Brian@epa.gov>  
**Cc:** Lamason, Bill <Lamason.Bill@epa.gov>  
**Subject:** RE: RIA for OIAI Rule Package (either supplemental or new proposal)



Hi Debra,

Sorry, I'm coming into this one cold and need a bit more background. What is OIAI?

**From:** Dalcher, Debra  
**Sent:** Friday, January 19, 2018 10:54 AM  
**To:** Shrager, Brian <[Shrager.Brian@epa.gov](mailto:Shrager.Brian@epa.gov)>  
**Cc:** Lamason, Bill <[Lamason.Bill@epa.gov](mailto:Lamason.Bill@epa.gov)>; Weatherhead, Darryl <[Weatherhead.Darryl@epa.gov](mailto:Weatherhead.Darryl@epa.gov)>  
**Subject:** Re: RIA for OIAI Rule Package (either supplemental or new proposal)

Thank you. Debra

---

**From:** Shrager, Brian  
**Sent:** Friday, January 19, 2018 10:51:12 AM  
**To:** Dalcher, Debra  
**Cc:** Lamason, Bill; Weatherhead, Darryl  
**Subject:** RE: RIA for OIAI Rule Package (either supplemental or new proposal)

## Ex. 5 - Deliberative Process

## Ex. 5 - Deliberative Process

Brian

**From:** Dalcher, Debra

**Sent:** Friday, January 19, 2018 9:59 AM

**To:** Shrager, Brian <Shrager.Brian@epa.gov>

**Cc:** Dalcher, Debra <dalcher.debra@epa.gov>; Lamason, Bill <Lamason.Bill@epa.gov>

**Subject:** **Ex. 5 - Deliberative Process**

Good Morning Brian,

## **Ex. 5 - Deliberative Process**

Thank you, Debra

**To:** Ashley, Jackie[Ashley.Jackie@epa.gov]  
**Cc:** Mills, Kathy[Mills.Kathy@epa.gov]; Dalcher, Debra[dalcher.debra@epa.gov]  
**From:** Lamason, Bill  
**Sent:** Thur 1/25/2018 4:16:16 PM  
**Subject:** RE: Draft Comms Plan for Today's Memo - Please Review ASAP

There is a new paragraph going into the memo and have a hunch that OAR and others may want to highlight that point. B

**From:** Ashley, Jackie  
**Sent:** Thursday, January 25, 2018 11:15 AM  
**To:** Lamason, Bill <Lamason.Bill@epa.gov>  
**Cc:** Mills, Kathy <Mills.Kathy@epa.gov>; Dalcher, Debra <dalcher.debra@epa.gov>  
**Subject:** Re: Draft Comms Plan for Today's Memo - Please Review ASAP

**Ex. 5 - Deliberative Process**

And will do. Thanks.

On Jan 25, 2018, at 11:13 AM, Lamason, Bill <Lamason.Bill@epa.gov> wrote:

**Ex. 5 - Deliberative Process**

Check with OAR comms.

**Ex. 5 - Deliberative Process**

I'd follow OAR lead. Bill

**From:** Ashley, Jackie  
**Sent:** Thursday, January 25, 2018 10:59 AM

**To:** Lamason, Bill <[Lamason.Bill@epa.gov](mailto:Lamason.Bill@epa.gov)>; Mills, Kathy <[Mills.Kathy@epa.gov](mailto:Mills.Kathy@epa.gov)>;  
Dalcher, Debra <[dalcher.debra@epa.gov](mailto:dalcher.debra@epa.gov)>  
**Subject:** RE: Draft Comms Plan for Today's Memo - Please Review ASAP

Can you do a gut check for facts in the next 5 minutes? Especially if there's anything substantive we need to flag. The first page through the statement is the most important part.

We can chase edits if we need to. The urgency is we'd like to give it to the press office ASAP as they are drafting a press release.

-----  
Jackie Ashley - US EPA - Office of Air Quality Planning and Standards - 919-541-7664 –  
[ashley.jackie@epa.gov](mailto:ashley.jackie@epa.gov)

**From:** Lamason, Bill  
**Sent:** Thursday, January 25, 2018 10:57 AM  
**To:** Ashley, Jackie <[Ashley.Jackie@epa.gov](mailto:Ashley.Jackie@epa.gov)>; Mills, Kathy <[Mills.Kathy@epa.gov](mailto:Mills.Kathy@epa.gov)>;  
Dalcher, Debra <[dalcher.debra@epa.gov](mailto:dalcher.debra@epa.gov)>  
**Subject:** RE: Draft Comms Plan for Today's Memo - Please Review ASAP

Looking at but multitasking with OAR on the memo. B

**From:** Ashley, Jackie  
**Sent:** Thursday, January 25, 2018 10:51 AM  
**To:** Cortelyou-Lee, Jan <[Cortelyou-Lee.Jan@epa.gov](mailto:Cortelyou-Lee.Jan@epa.gov)>; Mills, Kathy <[Mills.Kathy@epa.gov](mailto:Mills.Kathy@epa.gov)>; Dalcher, Debra <[dalcher.debra@epa.gov](mailto:dalcher.debra@epa.gov)>; Lamason, Bill <[Lamason.Bill@epa.gov](mailto:Lamason.Bill@epa.gov)>; DeLuca, Isabel <[DeLuca.Isabel@epa.gov](mailto:DeLuca.Isabel@epa.gov)>; Koerber, Mike <[Koerber.Mike@epa.gov](mailto:Koerber.Mike@epa.gov)>  
**Subject:** RE: Draft Comms Plan for Today's Memo - Please Review ASAP

Bill, Debra, KB –

Just checking on where you are in review.

-----

Jackie Ashley - US EPA - Office of Air Quality Planning and Standards - 919-541-7664 –  
[ashley.jackie@epa.gov](mailto:ashley.jackie@epa.gov)

**From:** Cortelyou-Lee, Jan

**Sent:** Thursday, January 25, 2018 10:02 AM

**To:** Mills, Kathy <[Mills.Kathy@epa.gov](mailto:Mills.Kathy@epa.gov)>; Dalcher, Debra <[dalcher.debra@epa.gov](mailto:dalcher.debra@epa.gov)>;  
Lamason, Bill <[Lamason.Bill@epa.gov](mailto:Lamason.Bill@epa.gov)>; Ashley, Jackie <[Ashley.Jackie@epa.gov](mailto:Ashley.Jackie@epa.gov)>;  
DeLuca, Isabel <[DeLuca.Isabel@epa.gov](mailto:DeLuca.Isabel@epa.gov)>; Koerber, Mike <[Koerber.Mike@epa.gov](mailto:Koerber.Mike@epa.gov)>

**Subject:** FW: Draft Comms Plan for Today's Memo - Please Review ASAP

Folks – I need to get a sick child of mine to the Dr. Jackie will cover this for the rest of the day. Please send her your comments.

Jackie – this version includes a few comments in tracked changes from Mike.

Jan Cortelyou-Lee

US Environmental Protection Agency

Office of Air Quality Planning and Standards

MD-C404-03

109 TW Alexander Drive

Research Triangle Park, NC 27709

Desk: 919-541-5393

Cell: 919-368-5734

**From:** Koerber, Mike  
**Sent:** Thursday, January 25, 2018 8:56 AM  
**To:** Cortelyou-Lee, Jan <[Cortelyou-Lee.Jan@epa.gov](mailto:Cortelyou-Lee.Jan@epa.gov)>; Dalcher, Debra <[dalcher.debra@epa.gov](mailto:dalcher.debra@epa.gov)>; Lamason, Bill <[Lamason.Bill@epa.gov](mailto:Lamason.Bill@epa.gov)>  
**Cc:** Mills, Kathy <[Mills.Kathy@epa.gov](mailto:Mills.Kathy@epa.gov)>  
**Subject:** RE: Draft Comms Plan for Today's Memo - Please Review ASAP

Minor edits attached

**From:** Cortelyou-Lee, Jan  
**Sent:** Thursday, January 25, 2018 8:42 AM  
**To:** Dalcher, Debra <[dalcher.debra@epa.gov](mailto:dalcher.debra@epa.gov)>; Lamason, Bill <[Lamason.Bill@epa.gov](mailto:Lamason.Bill@epa.gov)>; Koerber, Mike <[Koerber.Mike@epa.gov](mailto:Koerber.Mike@epa.gov)>  
**Cc:** Mills, Kathy <[Mills.Kathy@epa.gov](mailto:Mills.Kathy@epa.gov)>  
**Subject:** Draft Comms Plan for Today's Memo - Please Review ASAP

This include KBs QAs (with some minor adjustments) and additional pieces I think we need. Debra will you share with OGC?

I understand the plan is signature around 2 and posting to the web – distribution at 3ish with a press release. If I get a draft of that to share, I will. OAR would like to share this doc for press release fodder ASAP.

I will get something mocked up for the web with the ITG folks soon.

Jan Cortelyou-Lee

US Environmental Protection Agency

Office of Air Quality Planning and Standards

MD-C404-03

109 TW Alexander Drive

Research Triangle Park, NC 27709

Desk: 919-541-5393

Cell: 919-368-5734

**To:** Dalcher, Debra[dalcher.debra@epa.gov]  
**From:** Torres, Elineth  
**Sent:** Wed 11/15/2017 6:16:51 PM  
**Subject:** examples OIAI

## **Ex. 5 - Deliberative Process**

Elineth Torres

OAQPS

919-541-4347





**To:** Dalcher, Debra[dalcher.debra@epa.gov]  
**Cc:** Torres, Elineth[Torres.Elineth@epa.gov]; Lamason, Bill[Lamason.Bill@epa.gov]; Schrock, Bill[Schrock.Bill@epa.gov]; Hanks, Katie[hanks.katie@epa.gov]; Bradfield, John[Bradfield.John@epa.gov]  
**From:** Dunkins, Robin  
**Sent:** Tue 11/21/2017 7:24:05 PM  
**Subject:** RE: Examples OIAI  
[neucor-mnsr-draft-permit-analysis.pdf](#)  
[Permit Review Rpt Rosboro Springfield OR 2017.pdf](#)  
[Masonite Corp WI Marshfield.pdf](#)

## **Ex. 5 - Deliberative Process**

## **Ex. 5 - Deliberative Process**

## **Ex. 5 - Deliberative Process**

## **Ex. 5 - Deliberative Process**

## **Ex. 5 - Deliberative Process**

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## **Ex. 5 - Deliberative Process**

Robin Dunkins, Group Leader

Natural Resources Group

OAR/OAQPS/SPPD Mail Code: E143-03

U.S. Environmental Protection Agency

Research Triangle Park, NC 27711

919-541-5335

dunkins.robins@epa.gov

**From:** Dalcher, Debra

**Sent:** Wednesday, November 15, 2017 1:21 PM

**To:** Dunkins, Robin <Dunkins.Robin@epa.gov>

**Cc:** Torres, Elineth <Torres.Elineth@epa.gov>; Dalcher, Debra <dalcher.debra@epa.gov>; Lamason, Bill <Lamason.Bill@epa.gov>

**Subject:** Examples OIAI

**Importance:** High

Robin,

## Ex. 5 - Deliberative Process

Thank you much, Debra

**From:** Torres, Elineth

**Sent:** Wednesday, November 15, 2017 1:17 PM

**To:** Dalcher, Debra <dalcher.debra@epa.gov>

**Subject:** examples OIAI

# **Ex. 5 - Deliberative Process**

Elineth Torres

OAQPS

919-541-4347

**To:** Jordan, Scott[Jordan.Scott@epa.gov]; Schwab, Justin[Schwab.Justin@epa.gov]  
**Cc:** Rodman, Sonja[Rodman.Sonja@epa.gov]; Lamason, Bill[Lamason.Bill@epa.gov]; Dalcher, Debra[dalcher.debra@epa.gov]; Barnett, Keith[Barnett.Keith@epa.gov]; Storey, Brian[storey.brian@epa.gov]  
**From:** Harlow, David  
**Sent:** Tue 1/30/2018 1:56:35 PM  
**Subject:** RE: Brick MACT Litigation - Rule 28(j) Notice to Court of Wehrum Memo/Change in OIAI Policy - Review requested asap

Thank you for the update, Scott. In this instance, however, since my former firm represents one of the parties in this litigation, I am of course recused from any participation.

**David S. Harlow**  
**Senior Counsel**

**Immediate Office of the Assistant Administrator**  
**Office of Air and Radiation, USEPA**  
**WJC-N Room 5409K**

**1200 Pennsylvania Avenue NW**  
**Washington, DC 20460**  
**202-564-1233**

[Harlow.David@epa.gov](mailto:Harlow.David@epa.gov)

**From:** Jordan, Scott  
**Sent:** Tuesday, January 30, 2018 8:20 AM  
**To:** Schwab, Justin <Schwab.Justin@epa.gov>; Harlow, David <harlow.david@epa.gov>  
**Cc:** Rodman, Sonja <Rodman.Sonja@epa.gov>; Lamason, Bill <Lamason.Bill@epa.gov>; Dalcher, Debra <dalcher.debra@epa.gov>; Barnett, Keith <Barnett.Keith@epa.gov>; Storey, Brian <storey.brian@epa.gov>  
**Subject:** Brick MACT Litigation - Rule 28(j) Notice to Court of Wehrum Memo/Change in OIAI Policy - Review requested asap

David and Justin –

# **Ex. 5 - Attorney Client**

# **Ex. 5 - Attorney Client**

# **Ex. 5 - Attorney Client**

DOJ is planning to file this today (Tuesday) so there is no significant delay between the issuance of the memo and our providing notice of it to the court.

Please let us know asap if you have any questions or comments on the attached letter, or if we need to hold this to provide additional time for review.

Scott Jordan

Air and Radiation Law Office

Office of General Counsel

202-564-7508

**From:** Bowers, Kate (ENRD) [<mailto:Kate.Bowers@usdoj.gov>]  
**Sent:** Monday, January 29, 2018 12:52 PM  
**To:** [sonya.shea@usdoj.gov](mailto:sonya.shea@usdoj.gov); Rodman, Sonja <[Rodman.Sonja@epa.gov](mailto:Rodman.Sonja@epa.gov)>; Jordan, Scott <[Jordan.Scott@epa.gov](mailto:Jordan.Scott@epa.gov)>  
**Subject:** RE: Brick MACT - Reclassification of Major Sources Memo

Sonja and Scott—

Sonya is tied up this afternoon, so I'm circulating her draft 28(j) letter on her behalf. Please send us any comments as soon as is practicable.

Thanks,  
Kate

**From:** Shea, Sonya (ENRD)  
**Sent:** Friday, January 26, 2018 4:48 PM  
**To:** Rodman, Sonja <[Rodman.Sonja@epa.gov](mailto:Rodman.Sonja@epa.gov)>; Jordan, Scott <[Jordan.Scott@epa.gov](mailto:Jordan.Scott@epa.gov)>  
**Cc:** Bowers, Kate (ENRD) <[KBowers@ENRD.USDOJ.GOV](mailto:KBowers@ENRD.USDOJ.GOV)>  
**Subject:** RE: Brick MACT - Reclassification of Major Sources Memo

Great, I'll send a calendar invite. We can use my line: Ex. 6 - Personal Privacy; code Ex. 6 - Personal Privacy  
Scott—please let me know if 10:30 doesn't work for you.

**From:** Rodman, Sonja [<mailto:Rodman.Sonja@epa.gov>]  
**Sent:** Friday, January 26, 2018 3:12 PM  
**To:** Shea, Sonya (ENRD) <[sshea@ENRD.USDOJ.GOV](mailto:sshea@ENRD.USDOJ.GOV)>; Jordan, Scott <[Jordan.Scott@epa.gov](mailto:Jordan.Scott@epa.gov)>  
**Cc:** Bowers, Kate (ENRD) <[KBowers@ENRD.USDOJ.GOV](mailto:KBowers@ENRD.USDOJ.GOV)>  
**Subject:** RE: Brick MACT - Reclassification of Major Sources Memo

I could do 10:30



Sonja L. Rodman

Air Toxics, Consumer Protection and Indoor Air Practice Group

(202) 564-4079

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**From:** Shea, Sonya (ENRD) [<mailto:Sonya.Shea@usdoj.gov>]  
**Sent:** Friday, January 26, 2018 2:53 PM  
**To:** Rodman, Sonja <[Rodman.Sonja@epa.gov](mailto:Rodman.Sonja@epa.gov)>; Jordan, Scott <[Jordan.Scott@epa.gov](mailto:Jordan.Scott@epa.gov)>  
**Cc:** [kate.bowers@usdoj.gov](mailto:kate.bowers@usdoj.gov)  
**Subject:** RE: Brick MACT - Reclassification of Major Sources Memo

Does Monday work? I'm available outside of 11:30-3.

**From:** Rodman, Sonja [<mailto:Rodman.Sonja@epa.gov>]  
**Sent:** Friday, January 26, 2018 2:47 PM  
**To:** Shea, Sonya (ENRD) <[SShea@ENRD.USDOJ.GOV](mailto:SShea@ENRD.USDOJ.GOV)>; Jordan, Scott <[Jordan.Scott@epa.gov](mailto:Jordan.Scott@epa.gov)>  
**Cc:** Bowers, Kate (ENRD) <[KBowers@ENRD.USDOJ.GOV](mailto:KBowers@ENRD.USDOJ.GOV)>  
**Subject:** RE: Brick MACT - Reclassification of Major Sources Memo

## Ex. 5 - Attorney Client

Sonja L. Rodman

Air Toxics, Consumer Protection and Indoor Air Practice Group

(202) 564-4079

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**From:** Shea, Sonya (ENRD) [<mailto:Sonya.Shea@usdoj.gov>]  
**Sent:** Friday, January 26, 2018 2:09 PM  
**To:** Jordan, Scott <[Jordan.Scott@epa.gov](mailto:Jordan.Scott@epa.gov)>; Rodman, Sonja <[Rodman.Sonja@epa.gov](mailto:Rodman.Sonja@epa.gov)>  
**Cc:** [kate.bowers@usdoj.gov](mailto:kate.bowers@usdoj.gov)  
**Subject:** Brick MACT - Reclassification of Major Sources Memo

Hi Scott and Sonja,

Could we please discuss what implications the withdrawal of the Seitz memo and the new memo have for the arguments we advanced in the Brick MACT case?

I'm available today until 4, and between 5 and 5:30 pm. Please let me know if you're available, or if you'd prefer to set a time early next week.

Thank you,

Sonya

**To:** Jordan, Scott[Jordan.Scott@epa.gov]  
**Cc:** Rodman, Sonja[Rodman.Sonja@epa.gov]  
**From:** Dalcher, Debra  
**Sent:** Mon 1/22/2018 8:09:30 PM  
**Subject:** RE: Once-In-Always-In Question - NODA vs Supplemental Proposal vs New Proposal

Okay, as I mentioned this am I was given guidance from Kevin **Ex. 5 - Deliberative Process**  
**Ex. 5 - Deliberative Process** We will have to see what comes out of the Harlow Meeting  
on Wednesday with the possibility that we will need to discuss **Ex. 5 - Deliberative Process**  
**Ex. 5 - Deliberative Process**

**Ex. 5 - Deliberative Process**  
**Ex. 5 - Deliberative Process** I am trying to nail down the scope of that with HEID.

Thank you, Debra

**From:** Jordan, Scott  
**Sent:** Monday, January 22, 2018 3:01 PM  
**To:** Dalcher, Debra <dalcher.debra@epa.gov>  
**Cc:** Rodman, Sonja <Rodman.Sonja@epa.gov>  
**Subject:** FW: Once-In-Always-In Question - NODA vs Supplemental Proposal vs New Proposal

Debra –

**Ex. 5 - Attorney Client**

# Ex. 5 - Attorney Client

Scott Jordan

Air and Radiation Law Office

Office of General Counsel

202-564-7508

**From:** Prabhu, Aditi

**Sent:** Monday, January 22, 2018 2:55 PM

**To:** Jordan, Scott <[Jordan.Scott@epa.gov](mailto:Jordan.Scott@epa.gov)>; Simons, Andrew <[Simons.Andrew@epa.gov](mailto:Simons.Andrew@epa.gov)>

**Cc:** Rodman, Sonja <[Rodman.Sonja@epa.gov](mailto:Rodman.Sonja@epa.gov)>

**Subject:** RE: Once-In-Always-In Question - NODA vs Supplemental Proposal vs New Proposal

# Ex. 5 - Attorney Client

# Ex. 5 - Attorney Client

## **Ex. 5 - Attorney Client**

Aditi Prabhu  
Office of General Counsel  
U.S. Environmental Protection Agency  
(202)564-2473

**From:** Jordan, Scott  
**Sent:** Monday, January 22, 2018 12:52 PM  
**To:** Prabhu, Aditi <[Prabhu.Aditi@epa.gov](mailto:Prabhu.Aditi@epa.gov)>; Simons, Andrew <[Simons.Andrew@epa.gov](mailto:Simons.Andrew@epa.gov)>  
**Cc:** Rodman, Sonja <[Rodman.Sonja@epa.gov](mailto:Rodman.Sonja@epa.gov)>  
**Subject:** Once-In-Always-In Question - NODA vs Supplemental Proposal vs New Proposal

## **Ex. 5 - Attorney Client**

## **Ex. 5 - Attorney Client**

## **Ex. 5 - Attorney Client**

Scott Jordan

Air and Radiation Law Office

Office of General Counsel

202-564-7508

**To:** Dalcher, Debra[dalcher.debra@epa.gov]  
**Cc:** Rodman, Sonja[Rodman.Sonja@epa.gov]  
**From:** Jordan, Scott  
**Sent:** Mon 1/22/2018 8:00:33 PM  
**Subject:** FW: Once-In-Always-In Question - NODA vs Supplemental Proposal vs New Proposal

Debra –

**Ex. 5 - Attorney Client**

**Ex. 5 - Attorney Client**

**Ex. 5 - Attorney Client**

**Ex. 5 - Attorney Client**

Scott Jordan

Air and Radiation Law Office

Office of General Counsel

202-564-7508

**From:** Prabhu, Aditi  
**Sent:** Monday, January 22, 2018 2:55 PM  
**To:** Jordan, Scott <Jordan.Scott@epa.gov>; Simons, Andrew <Simons.Andrew@epa.gov>  
**Cc:** Rodman, Sonja <Rodman.Sonja@epa.gov>  
**Subject:** RE: Once-In-Always-In Question - NODA vs Supplemental Proposal vs New Proposal

## Ex. 5 - Attorney Client

## Ex. 5 - Attorney Client

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Office of General Counsel  
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**From:** Jordan, Scott  
**Sent:** Monday, January 22, 2018 12:52 PM  
**To:** Prabhu, Aditi <[Prabhu.Aditi@epa.gov](mailto:Prabhu.Aditi@epa.gov)>; Simons, Andrew <[Simons.Andrew@epa.gov](mailto:Simons.Andrew@epa.gov)>  
**Cc:** Rodman, Sonja <[Rodman.Sonja@epa.gov](mailto:Rodman.Sonja@epa.gov)>  
**Subject:** Once-In-Always-In Question - NODA vs Supplemental Proposal vs New Proposal

## Ex. 5 - Attorney Client



## **Ex. 5 - Attorney Client**

My questions are:

## **Ex. 5 - Attorney Client**

# **Ex. 5 - Attorney Client**

Scott Jordan

Air and Radiation Law Office

Office of General Counsel

202-564-7508

**To:** Dalcher, Debra[dalcher.debra@epa.gov]  
**Cc:** Jordan, Scott[Jordan.Scott@epa.gov]  
**From:** Harlow, David  
**Sent:** Wed 1/24/2018 3:47:15 PM  
**Subject:** RE: NRDC Comments & Proposed Language

## Ex. 5 - Attorney Client

**David S. Harlow**  
**Senior Counsel**

**Immediate Office of the Assistant Administrator**  
**Office of Air and Radiation, USEPA**  
**WJC-N Room 5409K**

**1200 Pennsylvania Avenue NW**  
**Washington, DC 20460**  
**202-564-1233**

[Harlow.David@epa.gov](mailto:Harlow.David@epa.gov)

**From:** Dalcher, Debra  
**Sent:** Wednesday, January 24, 2018 9:45 AM  
**To:** Harlow, David <harlow.david@epa.gov>  
**Cc:** Jordan, Scott <Jordan.Scott@epa.gov>; Dalcher, Debra <dalcher.debra@epa.gov>  
**Subject:** NRDC Comments & Proposed Language

**From:** Jordan, Scott  
**Sent:** Wednesday, January 24, 2018 9:01 AM  
**To:** Dalcher, Debra <dalcher.debra@epa.gov>  
**Cc:** Lamason, Bill <Lamason.Bill@epa.gov>; Culligan, Kevin <Culligan.Kevin@epa.gov>;  
Rodman, Sonja <Rodman.Sonja@epa.gov>  
**Subject:** OIAO - Possible revision

## Ex. 5 - Attorney Client

# Ex. 5 - Attorney Client

Scott Jordan

Air and Radiation Law Office

Office of General Counsel

202-564-7508

**From:** Dalcher, Debra

**Sent:** Monday, January 22, 2018 3:56 PM

**To:** Jordan, Scott <[Jordan.Scott@epa.gov](mailto:Jordan.Scott@epa.gov)>

**Cc:** Dalcher, Debra <[dalcher.debra@epa.gov](mailto:dalcher.debra@epa.gov)>; Lamason, Bill <[Lamason.Bill@epa.gov](mailto:Lamason.Bill@epa.gov)>;  
Culligan, Kevin <[Culligan.Kevin@epa.gov](mailto:Culligan.Kevin@epa.gov)>; Rodman, Sonja <[Rodman.Sonja@epa.gov](mailto:Rodman.Sonja@epa.gov)>

**Subject:** RE: Reclassification of Major Sources as Area Sources Under Section 112\_Draft\_1 22  
18\_1pm.docx

Scott,

# Ex. 5 - Attorney Client

# Ex. 5 - Attorney Client

Thank you, Debra

**From:** Dalcher, Debra

**Sent:** Monday, January 22, 2018 3:02 PM

**To:** Jordan, Scott <[Jordan.Scott@epa.gov](mailto:Jordan.Scott@epa.gov)>

**Cc:** Dalcher, Debra <[dalcher.debra@epa.gov](mailto:dalcher.debra@epa.gov)>

**Subject:** Reclassification of Major Sources as Area Sources Under Section 112\_Draft\_1 22  
18\_1pm.docx

Scott, see attached.

# Ex. 5 - Attorney Client

Debra



# TRANSMISSION CHECKLIST TO WASHINGTON OPERATIONS

## FR NOTICES TO BE SIGNED BY OAR

(Extension of Public Comment Period, Notice of Public Meeting or  
Workshop, Data Availability, Etc.)

**Project Name:** Issuance of Guidance Memorandum, "Reclassification of Major Sources as Area Sources Under Section 112 of the Clean Air Act"

**SAN:** 4908 **RIN:** 2060-AM75 **Tier:** 3 (approval date: 10/1/04)

**OMB Significant (Y/N):** N/A (**Date:** \_\_\_\_\_) **Stat or Judicial Date:** \_\_\_\_\_

**Project Lead and Phone Number:** Debra Dalcher, (919) 541-2443

**Group Leader Signature and Date:** Bill Lamason, (919) 541-5374 \_\_\_\_\_ **(required)**

REQUIRED ITEMS	INCLUDED	REASON NOT INCLUDED
If your notice contains reg text, see Michael Benson/Reg Text Review	Date:	No regulatory text.
Post-It Note to OAR	✓	
Action Memo from OAQPS to OAR	✓	
Federal Register Notice (Notification) and Guidance Memorandum	✓	
Fact Sheet (if needed, confirm w/PACS)		N/A
Communications Plan (if needed, confirm w/PACS)		PACS is working on. POC Jan Cortelyou-Lee & Jenny Noonan
Action Information Form	✓	
FR Publication Cover Form	✓	
Federal Register Typesetting Request (EPA 2340-15) - signed by project lead	✓	
OGC Concurrence/Attorney Name	Date: 1/24/18	
Email confirmation from OGC agreeing that the package is ready to move forward	✓	

\* = Tiering is not required for AA level signature, therefore, tiering may not have occurred.

**(Revised 10/2017)**

**Are there any outstanding issues and/or comments? Must this package be expedited (justify)?**

**To:** Dalcher, Debra[dalcher.debra@epa.gov]  
**From:** Lamason, Bill  
**Sent:** Tue 12/5/2017 3:56:33 PM  
**Subject:** Fwd: URGENT - NSR Improvement Projects - summary work plan 12-5-17\_BL Markup.docx  
[NSR Improvement Projects - summary work plan 12-5-17 BL Markup.docx](#)  
[ATT00001.htm](#)

Debra, I printed this on the D220 printer. Can you bring to me in D201? Thanks. B

Sent from my iPhone

Begin forwarded message:

**From:** "Lamason, Bill" <[Lamason.Bill@epa.gov](mailto:Lamason.Bill@epa.gov)>  
**Date:** December 5, 2017 at 10:49:21 AM EST  
**To:** "Culligan, Kevin" <[Culligan.Kevin@epa.gov](mailto:Culligan.Kevin@epa.gov)>  
**Cc:** "Conner, Lisa" <[Conner.Lisa@epa.gov](mailto:Conner.Lisa@epa.gov)>, "French, Chuck" <[French.Chuck@epa.gov](mailto:French.Chuck@epa.gov)>, "Dalcher, Debra" <[dalcher.debra@epa.gov](mailto:dalcher.debra@epa.gov)>  
**Subject:** URGENT - NSR Improvement Projects - summary work plan 12-5-17\_BL Markup.docx

## Ex. 5 - Deliberative Process

Bill

**To:** Dalcher, Debra[dalcher.debra@epa.gov]  
**Cc:** Vetter, Rick[Vetter.Rick@epa.gov]; Rodman, Sonja[Rodman.Sonja@epa.gov]  
**From:** Jordan, Scott  
**Sent:** Tue 12/5/2017 1:03:13 PM  
**Subject:** OIAI Draft Memo

## Ex. 5 - Attorney Client

Debra -

# Ex. 5 - Attorney Client

Thanks,

Scott Jordan

Air and Radiation Law Office

Office of General Counsel

202-564-7508

---

**From:** Rodman, Sonja  
**Sent:** Monday, December 4, 2017 12:39 PM  
**To:** Jordan, Scott; Dalcher, Debra  
**Cc:** Vetter, Rick



**Subject:** RE: OIAI Draft Memo - Two corrections to comments

## Ex. 5 - Attorney Client

Sonja L. Rodman

Air Toxics, Consumer Protection and Indoor Air Practice Group

(202) 564-4079

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**From:** Jordan, Scott

**Sent:** Monday, December 04, 2017 9:28 AM

**To:** Dalcher, Debra <dalcher.debra@epa.gov>

**Cc:** Vetter, Rick <Vetter.Rick@epa.gov>; Rodman, Sonja <Rodman.Sonja@epa.gov>

**Subject:** OIAI Draft Memo - Two corrections to comments

Debra –

## Ex. 5 - Deliberative Process

Scott Jordan

Air and Radiation Law Office

Office of General Counsel

202-564-7508

**From:** Dalcher, Debra

**Sent:** Monday, December 04, 2017 8:44 AM

**To:** Lamason, Bill <[Lamason.Bill@epa.gov](mailto:Lamason.Bill@epa.gov)>; French, Chuck  
<[French.Chuck@epa.gov](mailto:French.Chuck@epa.gov)>; McLamb, Marguerite <[McLamb.Marguerite@epa.gov](mailto:McLamb.Marguerite@epa.gov)>;  
Culligan, Kevin <[Culligan.Kevin@epa.gov](mailto:Culligan.Kevin@epa.gov)>; Vetter, Rick <[Vetter.Rick@epa.gov](mailto:Vetter.Rick@epa.gov)>;  
Jordan, Scott <[Jordan.Scott@epa.gov](mailto:Jordan.Scott@epa.gov)>

**Cc:** Dalcher, Debra <[dalcher.debra@epa.gov](mailto:dalcher.debra@epa.gov)>

**Subject:** OIAI\_12.4.17 0800 DD.docx

**Importance:** High

Good Morning Everyone,

## Ex. 5 - Attorney Client

## **Ex. 5 - Attorney Client**

Thank you, Debra

**To:** Dalcher, Debra[dalcher.debra@epa.gov]  
**Cc:** Lamason, Bill[Lamason.Bill@epa.gov]  
**From:** Jordan, Scott  
**Sent:** Mon 1/8/2018 7:30:34 PM  
**Subject:** RE: OIAI Memo Update - Guidance from Peter T

## Ex. 5 - Attorney Client

Scott Jordan

Air and Radiation Law Office

Office of General Counsel

202-564-7508

-----Original Appointment-----

**From:** Dalcher, Debra

**Sent:** Monday, January 08, 2018 1:44 PM

**To:** Dalcher, Debra; Jordan, Scott; Lamason, Bill

**Subject:** OIAI Memo Update - Guidance from Peter T

**When:** Monday, January 08, 2018 3:30 PM-4:00 PM (UTC-05:00) Eastern Time (US & Canada).

**Where:** RTP-OAQPS-919-541-4486-SPPD/Phone-Line/RTP-OAQPS-BLDG-C

## Ex. 5 - Attorney Client

**To:** Dalcher, Debra[dalcher.debra@epa.gov]  
**From:** Lamason, Bill  
**Sent:** Mon 11/20/2017 11:17:40 PM  
**Subject:** FW: Memo replacing OIAI with proposed 2007 interpretation\_11\_20\_17\_3pm.docx

Meant to send this to you! B

Nice note again! 2 for 2! Thanks. I may be able to call in to the discussion in the morning if that would help. Will watch for invite. B

-----Original Message-----

From: McLamb, Marguerite  
Sent: Monday, November 20, 2017 6:08 PM  
To: Rodman, Sonja <Rodman.Sonja@epa.gov>; Dalcher, Debra <dalcher.debra@epa.gov>  
Cc: Vetter, Rick <Vetter.Rick@epa.gov>; Lamason, Bill <Lamason.Bill@epa.gov>; Culligan, Kevin <Culligan.Kevin@epa.gov>; French, Chuck <French.Chuck@epa.gov>  
Subject: RE: Memo replacing OIAI with proposed 2007 interpretation\_11\_20\_17\_3pm.docx

Great. Sonja, I will set up a time to talk in the morning. Thanks, everyone.

\*\*\*\*\*

Marguerite E. McLamb  
Policy Advisor  
Sector Policies and Programs Division  
Office of Air Quality Planning & Standards U.S. Environmental Protection Agency Research Triangle  
Park, NC 27711  
Phone: (919) 541-7858  
Fax: (919) 541-4991  
mclamb.marguerite@epa.gov

---

From: Rodman, Sonja  
Sent: Monday, November 20, 2017 5:54 PM  
To: Dalcher, Debra; McLamb, Marguerite  
Cc: Vetter, Rick; Lamason, Bill; Culligan, Kevin; French, Chuck  
Subject: RE: Memo replacing OIAI with proposed 2007 interpretation\_11\_20\_17\_3pm.docx

Thanks everyone, Marguerite give me a call if you'd like to discuss. I have some ideas . . .

Sonja L. Rodman  
Air Toxics, Consumer Protection and Indoor Air Practice Group  
(202) 564-4079

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From: Dalcher, Debra  
Sent: Monday, November 20, 2017 3:22 PM  
To: McLamb, Marguerite <McLamb.Marguerite@epa.gov>  
Cc: Vetter, Rick <Vetter.Rick@epa.gov>; Lamason, Bill <Lamason.Bill@epa.gov>; Dalcher, Debra <dalcher.debra@epa.gov>; Culligan, Kevin <Culligan.Kevin@epa.gov>; Rodman, Sonja <Rodman.Sonja@epa.gov>; French, Chuck <French.Chuck@epa.gov>  
Subject: Memo replacing OIAI with proposed 2007 interpretation\_11\_20\_17\_3pm.docx  
Importance: High

Marguerite,

# **Ex. 5 - Attorney Client**

I have not received the list we discussed from Kevin yet. I will be in the office Tuesday and Wednesday of this week working on the memo and starting review/work on the 2007 proposal comments.

Thank you everyone, Debra

**To:** Dalcher, Debra[dalcher.debra@epa.gov]  
**Cc:** French, Chuck[French.Chuck@epa.gov]  
**From:** Lamason, Bill  
**Sent:** Mon 11/20/2017 11:12:49 PM  
**Subject:** RE: Peter's Example Regarding re. 129 rules

Great note! Thanks! Bill

PS – Copying Chuck since he was in on the discussion as well. B

**From:** Dalcher, Debra  
**Sent:** Monday, November 20, 2017 4:18 PM  
**To:** Culligan, Kevin <Culligan.Kevin@epa.gov>; McLamb, Marguerite <McLamb.Marguerite@epa.gov>  
**Cc:** Lamason, Bill <Lamason.Bill@epa.gov>; Dalcher, Debra <dalcher.debra@epa.gov>  
**Subject:** Peter's Example Regarding re. 129 rules

Kevin, Marguerite

## Ex. 5 - Deliberative Process

Thank you, Debra

Debra S. Dalcher

U.S. EPA

Policy and Strategies Group

Sector Policies and Programs Division, OAQPS

109 T.W. Alexander Drive

Research Triangle Park, NC 27711

Phone: 919-541-2443



**To:** Rodman, Sonja[Rodman.Sonja@epa.gov]; Dalcher, Debra[dalcher.debra@epa.gov]  
**Cc:** McLamb, Marguerite[McLamb.Marguerite@epa.gov]; Lamason, Bill[Lamason.Bill@epa.gov]  
**From:** Vetter, Rick  
**Sent:** Mon 11/20/2017 7:18:03 PM  
**Subject:** RE: Current Version of Revision Memo

Debra,

## Ex. 5 - Attorney Client

Rick

Richard H. Vetter

Richard H. Vetter

Attorney Advisor

Air & Radiation Law Office

Office of General Counsel

[vetter.rick@epa.gov](mailto:vetter.rick@epa.gov)

919-541-2127

**From:** Rodman, Sonja  
**Sent:** Monday, November 20, 2017 1:55 PM  
**To:** Dalcher, Debra <dalcher.debra@epa.gov>  
**Cc:** Vetter, Rick <Vetter.Rick@epa.gov>; McLamb, Marguerite <McLamb.Marguerite@epa.gov>; Lamason, Bill <Lamason.Bill@epa.gov>  
**Subject:** Re: Current Version of Revision Memo

Thanks! I'd like to read after Rick so that I get the benefit of his input also.

Sent from my iPhone

On Nov 20, 2017, at 1:51 PM, Dalcher, Debra <[dalcher.debra@epa.gov](mailto:dalcher.debra@epa.gov)> wrote:

<image002.gif>

Hi Sonja,

## Ex. 5 - Attorney Client

Thank you, Debra

**From:** Rodman, Sonja

**Sent:** Monday, November 20, 2017 9:20 AM

**To:** Lamason, Bill <[Lamason.Bill@epa.gov](mailto:Lamason.Bill@epa.gov)>; Dalcher, Debra <[dalcher.debra@epa.gov](mailto:dalcher.debra@epa.gov)>

**Cc:** Torres, Elineth <[Torres.Elineth@epa.gov](mailto:Torres.Elineth@epa.gov)>; Vetter, Rick <[Vetter.Rick@epa.gov](mailto:Vetter.Rick@epa.gov)>;

McLamb, Marguerite <[McLamb.Marguerite@epa.gov](mailto:McLamb.Marguerite@epa.gov)>

**Subject:** RE: Current Version of Revision Memo

## Ex. 5 - Attorney Client

Sonja L. Rodman

Air Toxics, Consumer Protection and Indoor Air Practice Group

(202) 564-4079

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**From:** Lamason, Bill  
**Sent:** Friday, November 17, 2017 2:44 PM  
**To:** Rodman, Sonja <[Rodman.Sonja@epa.gov](mailto:Rodman.Sonja@epa.gov)>; Dalcher, Debra <[dalcher.debra@epa.gov](mailto:dalcher.debra@epa.gov)>  
**Cc:** Torres, Elineth <[Torres.Elineth@epa.gov](mailto:Torres.Elineth@epa.gov)>; Vetter, Rick <[Vetter.Rick@epa.gov](mailto:Vetter.Rick@epa.gov)>; McLamb, Marguerite <[McLamb.Marguerite@epa.gov](mailto:McLamb.Marguerite@epa.gov)>  
**Subject:** RE: Current Version of Revision Memo

Sonja,

Sonja,

## Ex. 5 - Attorney Client

Thanks!

Bill

**From:** Rodman, Sonja  
**Sent:** Friday, November 17, 2017 12:17 PM  
**To:** Lamason, Bill <[Lamason.Bill@epa.gov](mailto:Lamason.Bill@epa.gov)>; Dalcher, Debra <[dalcher.debra@epa.gov](mailto:dalcher.debra@epa.gov)>  
**Cc:** Torres, Elineth <[Torres.Elineth@epa.gov](mailto:Torres.Elineth@epa.gov)>; Vetter, Rick <[Vetter.Rick@epa.gov](mailto:Vetter.Rick@epa.gov)>; McLamb, Marguerite <[McLamb.Marguerite@epa.gov](mailto:McLamb.Marguerite@epa.gov)>  
**Subject:** RE: Current Version of Revision Memo

## Ex. 5 - Attorney Client

Sonja L. Rodman

Air Toxics, Consumer Protection and Indoor Air Practice Group

(202) 564-4079

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**From:** Lamason, Bill  
**Sent:** Thursday, November 16, 2017 4:53 PM  
**To:** Dalcher, Debra <[dalcher.debra@epa.gov](mailto:dalcher.debra@epa.gov)>; Rodman, Sonja <[Rodman.Sonja@epa.gov](mailto:Rodman.Sonja@epa.gov)>  
**Cc:** Torres, Elineth <[Torres.Elineth@epa.gov](mailto:Torres.Elineth@epa.gov)>; Vetter, Rick <[Vetter.Rick@epa.gov](mailto:Vetter.Rick@epa.gov)>;

McLamb, Marguerite <[McLamb.Marguerite@epa.gov](mailto:McLamb.Marguerite@epa.gov)>  
**Subject:** RE: Current Version of Revision Memo

Debra and Sonja,

## Ex. 5 - Deliberative Process

Bill

**From:** Dalcher, Debra  
**Sent:** Thursday, November 16, 2017 4:47 PM  
**To:** Rodman, Sonja <[Rodman.Sonja@epa.gov](mailto:Rodman.Sonja@epa.gov)>; Lamason, Bill <[Lamason.Bill@epa.gov](mailto:Lamason.Bill@epa.gov)>  
**Cc:** Torres, Elineth <[Torres.Elineth@epa.gov](mailto:Torres.Elineth@epa.gov)>; Vetter, Rick <[Vetter.Rick@epa.gov](mailto:Vetter.Rick@epa.gov)>;  
McLamb, Marguerite <[McLamb.Marguerite@epa.gov](mailto:McLamb.Marguerite@epa.gov)>  
**Subject:** RE: Current Version of Revision Memo

Hi Sonja,

## Ex. 5 - Attorney Client

Tomorrow is my CDO.

Thank you! Debra

**From:** Rodman, Sonja  
**Sent:** Thursday, November 16, 2017 2:38 PM  
**To:** Dalcher, Debra <[dalcher.debra@epa.gov](mailto:dalcher.debra@epa.gov)>; Vetter, Rick <[Vetter.Rick@epa.gov](mailto:Vetter.Rick@epa.gov)>; McLamb, Marguerite <[McLamb.Marguerite@epa.gov](mailto:McLamb.Marguerite@epa.gov)>  
**Cc:** Torres, Elineth <[Torres.Elineth@epa.gov](mailto:Torres.Elineth@epa.gov)>; Lamason, Bill <[Lamason.Bill@epa.gov](mailto:Lamason.Bill@epa.gov)>  
**Subject:** RE: Current Version of Revision Memo

## Ex. 5 - Attorney Client

Sonja L. Rodman

Air Toxics, Consumer Protection and Indoor Air Practice Group

(202) 564-4079

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**From:** Dalcher, Debra  
**Sent:** Thursday, November 16, 2017 2:27 PM  
**To:** Vetter, Rick <[Vetter.Rick@epa.gov](mailto:Vetter.Rick@epa.gov)>; McLamb, Marguerite

<[McLamb.Marguerite@epa.gov](mailto:McLamb.Marguerite@epa.gov)>; Rodman, Sonja <[Rodman.Sonja@epa.gov](mailto:Rodman.Sonja@epa.gov)>  
**Cc:** Torres, Elineth <[Torres.Elineth@epa.gov](mailto:Torres.Elineth@epa.gov)>; Lamason, Bill <[Lamason.Bill@epa.gov](mailto:Lamason.Bill@epa.gov)>  
**Subject:** RE: Current Version of Revision Memo

Rick,

## Ex. 5 - Attorney Client

Thank you everyone, Debra

**From:** Vetter, Rick  
**Sent:** Thursday, November 16, 2017 2:15 PM  
**To:** Dalcher, Debra <[dalcher.debra@epa.gov](mailto:dalcher.debra@epa.gov)>; McLamb, Marguerite <[McLamb.Marguerite@epa.gov](mailto:McLamb.Marguerite@epa.gov)>; Lamason, Bill <[Lamason.Bill@epa.gov](mailto:Lamason.Bill@epa.gov)>; Rodman, Sonja <[Rodman.Sonja@epa.gov](mailto:Rodman.Sonja@epa.gov)>  
**Cc:** Torres, Elineth <[Torres.Elineth@epa.gov](mailto:Torres.Elineth@epa.gov)>  
**Subject:** RE: Current Version of Revision Memo

## Ex. 5 - Attorney Client

Rick

Richard H. Vetter

Richard H. Vetter

Attorney Advisor

Air & Radiation Law Office

Office of General Counsel

[vetter.rick@epa.gov](mailto:vetter.rick@epa.gov)

919-541-2127

**From:** Dalcher, Debra

**Sent:** Thursday, November 16, 2017 1:40 PM

**To:** Vetter, Rick <[Vetter.Rick@epa.gov](mailto:Vetter.Rick@epa.gov)>; McLamb, Marguerite  
<[McLamb.Marguerite@epa.gov](mailto:McLamb.Marguerite@epa.gov)>; Lamason, Bill <[Lamason.Bill@epa.gov](mailto:Lamason.Bill@epa.gov)>; Rodman, Sonja  
<[Rodman.Sonja@epa.gov](mailto:Rodman.Sonja@epa.gov)>

**Cc:** Torres, Elineth <[Torres.Elineth@epa.gov](mailto:Torres.Elineth@epa.gov)>

**Subject:** RE: Current Version of Revision Memo

Rick,

This is the current version.

Thank you, Debra

**From:** Vetter, Rick

**Sent:** Thursday, November 16, 2017 1:30 PM

**To:** Dalcher, Debra <[dalcher.debra@epa.gov](mailto:dalcher.debra@epa.gov)>; McLamb, Marguerite  
<[McLamb.Marguerite@epa.gov](mailto:McLamb.Marguerite@epa.gov)>; Lamason, Bill <[Lamason.Bill@epa.gov](mailto:Lamason.Bill@epa.gov)>; Rodman, Sonja  
<[Rodman.Sonja@epa.gov](mailto:Rodman.Sonja@epa.gov)>

**Cc:** Torres, Elineth <[Torres.Elineth@epa.gov](mailto:Torres.Elineth@epa.gov)>

**Subject:** RE: Current Version of Revision Memo



Debra,

## Ex. 5 - Attorney Client

Rick

Richard H. Vetter

Richard H. Vetter

Attorney Advisor

Air & Radiation Law Office

Office of General Counsel

[vetter.rick@epa.gov](mailto:vetter.rick@epa.gov)

919-541-2127

**From:** Dalcher, Debra

**Sent:** Monday, November 13, 2017 4:09 PM

**To:** McLamb, Marguerite <[McLamb.Marguerite@epa.gov](mailto:McLamb.Marguerite@epa.gov)>; Vetter, Rick  
<[Vetter.Rick@epa.gov](mailto:Vetter.Rick@epa.gov)>; Lamason, Bill <[Lamason.Bill@epa.gov](mailto:Lamason.Bill@epa.gov)>; Rodman, Sonja  
<[Rodman.Sonja@epa.gov](mailto:Rodman.Sonja@epa.gov)>

**Cc:** Dalcher, Debra <[dalcher.debra@epa.gov](mailto:dalcher.debra@epa.gov)>; Torres, Elineth <[Torres.Elineth@epa.gov](mailto:Torres.Elineth@epa.gov)>

**Subject:** Current Version of Revision Memo

**Importance:** High

As promised during our meeting this morning I am sending out the current working draft of the memo for your review/any comments.

Elineth and I will begin work on this again tomorrow. We would appreciate any feedback you might have on the attached.

Thank you, Debra

Debra S. Dalcher

U.S. EPA

Policy and Strategies Group

Sector Policies and Programs Division, OAQPS

109 T.W. Alexander Drive

Research Triangle Park, NC 27711

Phone: 919-541-2443

**To:** Dalcher, Debra[dalcher.debra@epa.gov]; Lamason, Bill[Lamason.Bill@epa.gov]; Koerber, Mike[Koerber.Mike@epa.gov]  
**Cc:** Mills, Kathy[Mills.Kathy@epa.gov]  
**From:** Cortelyou-Lee, Jan  
**Sent:** Thur 1/25/2018 1:41:45 PM  
**Subject:** Draft Comms Plan for Today's Memo - Please Review ASAP  
[Reclassification of Major Sources Comms Plan.docx](#)

# Ex. 5 - Deliberative Process

Jan Cortelyou-Lee

US Environmental Protection Agency

Office of Air Quality Planning and Standards

MD-C404-03

109 TW Alexander Drive

Research Triangle Park, NC 27709

Desk: 919-541-5393

Cell: 919-368-5734

**To:** Dalcher, Debra[dalcher.debra@epa.gov]  
**Cc:** Lamason, Bill[Lamason.Bill@epa.gov]  
**From:** Ashley, Jackie  
**Sent:** Thur 1/25/2018 5:41:04 PM  
**Subject:** Copy of Comms plan  
[Reclassification of Major Sources Comms Plan 11am.docx](#)

## Ex. 5 - Deliberative Process

-----  
Jackie Ashley - US EPA - Office of Air Quality Planning and Standards - 919-541-7664 – ashley.jackie@epa.gov

**To:** Dalcher, Debra[dalcher.debra@epa.gov]; Lamason, Bill[Lamason.Bill@epa.gov]  
**Cc:** Mills, Kathy[Mills.Kathy@epa.gov]  
**From:** Ashley, Jackie  
**Sent:** Thur 1/25/2018 4:38:05 PM  
**Subject:** RE: Draft Comms Plan for Today's Memo - Please Review ASAP

## Ex. 5 - Deliberative Process

-----  
Jackie Ashley - US EPA - Office of Air Quality Planning and Standards - 919-541-7664 – ashley.jackie@epa.gov

**From:** Dalcher, Debra  
**Sent:** Thursday, January 25, 2018 11:16 AM  
**To:** Ashley, Jackie <Ashley.Jackie@epa.gov>; Lamason, Bill <Lamason.Bill@epa.gov>  
**Cc:** Mills, Kathy <Mills.Kathy@epa.gov>  
**Subject:** RE: Draft Comms Plan for Today's Memo - Please Review ASAP

## Ex. 5 - Deliberative Process

Thank you, Debra

**From:** Ashley, Jackie  
**Sent:** Thursday, January 25, 2018 11:15 AM  
**To:** Lamason, Bill <Lamason.Bill@epa.gov>  
**Cc:** Mills, Kathy <Mills.Kathy@epa.gov>; Dalcher, Debra <dalcher.debra@epa.gov>  
**Subject:** Re: Draft Comms Plan for Today's Memo - Please Review ASAP

## Ex. 5 - Deliberative Process

And will do. Thanks.

On Jan 25, 2018, at 11:13 AM, Lamason, Bill <[Lamason.Bill@epa.gov](mailto:Lamason.Bill@epa.gov)> wrote:

## Ex. 5 - Deliberative Process

**From:** Ashley, Jackie

**Sent:** Thursday, January 25, 2018 10:59 AM

**To:** Lamason, Bill <[Lamason.Bill@epa.gov](mailto:Lamason.Bill@epa.gov)>; Mills, Kathy <[Mills.Kathy@epa.gov](mailto:Mills.Kathy@epa.gov)>;  
Dalcher, Debra <[dalcher.debra@epa.gov](mailto:dalcher.debra@epa.gov)>

**Subject:** RE: Draft Comms Plan for Today's Memo - Please Review ASAP

## Ex. 5 - Deliberative Process

-----  
Jackie Ashley - US EPA - Office of Air Quality Planning and Standards - 919-541-7664 –  
[ashley.jackie@epa.gov](mailto:ashley.jackie@epa.gov)

**From:** Lamason, Bill

**Sent:** Thursday, January 25, 2018 10:57 AM

**To:** Ashley, Jackie <[Ashley.Jackie@epa.gov](mailto:Ashley.Jackie@epa.gov)>; Mills, Kathy <[Mills.Kathy@epa.gov](mailto:Mills.Kathy@epa.gov)>; Dalcher, Debra <[dalcher.debra@epa.gov](mailto:dalcher.debra@epa.gov)>

**Subject:** RE: Draft Comms Plan for Today's Memo - Please Review ASAP

## Ex. 5 - Deliberative Process

**From:** Ashley, Jackie

**Sent:** Thursday, January 25, 2018 10:51 AM

**To:** Cortelyou-Lee, Jan <[Cortelyou-Lee.Jan@epa.gov](mailto:Cortelyou-Lee.Jan@epa.gov)>; Mills, Kathy <[Mills.Kathy@epa.gov](mailto:Mills.Kathy@epa.gov)>; Dalcher, Debra <[dalcher.debra@epa.gov](mailto:dalcher.debra@epa.gov)>; Lamason, Bill <[Lamason.Bill@epa.gov](mailto:Lamason.Bill@epa.gov)>; DeLuca, Isabel <[DeLuca.Isabel@epa.gov](mailto:DeLuca.Isabel@epa.gov)>; Koerber, Mike <[Koerber.Mike@epa.gov](mailto:Koerber.Mike@epa.gov)>

**Subject:** RE: Draft Comms Plan for Today's Memo - Please Review ASAP

Bill, Debra, KB –

## Ex. 5 - Deliberative Process

-----  
Jackie Ashley - US EPA - Office of Air Quality Planning and Standards - 919-541-7664 –  
[ashley.jackie@epa.gov](mailto:ashley.jackie@epa.gov)

**From:** Cortelyou-Lee, Jan

**Sent:** Thursday, January 25, 2018 10:02 AM

**To:** Mills, Kathy <[Mills.Kathy@epa.gov](mailto:Mills.Kathy@epa.gov)>; Dalcher, Debra <[dalcher.debra@epa.gov](mailto:dalcher.debra@epa.gov)>; Lamason, Bill <[Lamason.Bill@epa.gov](mailto:Lamason.Bill@epa.gov)>; Ashley, Jackie <[Ashley.Jackie@epa.gov](mailto:Ashley.Jackie@epa.gov)>; DeLuca, Isabel <[DeLuca.Isabel@epa.gov](mailto:DeLuca.Isabel@epa.gov)>; Koerber, Mike <[Koerber.Mike@epa.gov](mailto:Koerber.Mike@epa.gov)>

**Subject:** FW: Draft Comms Plan for Today's Memo - Please Review ASAP

## Ex. 6 - Personal Privacy

Folks –  
day. Please send her your comments.

Jackie will cover this for the rest of the

## Ex. 5 - Deliberative Process

Jan Cortelyou-Lee

US Environmental Protection Agency

Office of Air Quality Planning and Standards

MD-C404-03

109 TW Alexander Drive

Research Triangle Park, NC 27709

Desk: 919-541-5393

Cell: 919-368-5734

**From:** Koerber, Mike

**Sent:** Thursday, January 25, 2018 8:56 AM

**To:** Cortelyou-Lee, Jan <[Cortelyou-Lee.Jan@epa.gov](mailto:Cortelyou-Lee.Jan@epa.gov)>; Dalcher, Debra <[dalcher.debra@epa.gov](mailto:dalcher.debra@epa.gov)>; Lamason, Bill <[Lamason.Bill@epa.gov](mailto:Lamason.Bill@epa.gov)>

**Cc:** Mills, Kathy <[Mills.Kathy@epa.gov](mailto:Mills.Kathy@epa.gov)>

**Subject:** RE: Draft Comms Plan for Today's Memo - Please Review ASAP

## Ex. 5 - Deliberative Process

**From:** Cortelyou-Lee, Jan

**Sent:** Thursday, January 25, 2018 8:42 AM

**To:** Dalcher, Debra <[dalcher.debra@epa.gov](mailto:dalcher.debra@epa.gov)>; Lamason, Bill <[Lamason.Bill@epa.gov](mailto:Lamason.Bill@epa.gov)>; Koerber, Mike <[Koerber.Mike@epa.gov](mailto:Koerber.Mike@epa.gov)>

**Cc:** Mills, Kathy <[Mills.Kathy@epa.gov](mailto:Mills.Kathy@epa.gov)>

**Subject:** Draft Comms Plan for Today's Memo - Please Review ASAP



# **Ex. 5 - Deliberative Process**

Jan Cortelyou-Lee

US Environmental Protection Agency

Office of Air Quality Planning and Standards

MD-C404-03

109 TW Alexander Drive

Research Triangle Park, NC 27709

Desk: 919-541-5393

Cell: 919-368-5734

**To:** Dalcher, Debra[dalcher.debra@epa.gov]  
**Cc:** Jordan, Scott[Jordan.Scott@epa.gov]; Rodman, Sonja[Rodman.Sonja@epa.gov]  
**From:** Ashley, Jackie  
**Sent:** Thur 1/25/2018 4:16:52 PM  
**Subject:** RE: Reclassification of Major Sources Comms Plan MK.docx  
[Reclassification of Major Sources Comms Plan 11am.docx](#)

Thanks Debra.

## Ex. 5 - Deliberative Process

-----  
Jackie Ashley - US EPA - Office of Air Quality Planning and Standards - 919-541-7664 – ashley.jackie@epa.gov

**From:** Dalcher, Debra  
**Sent:** Thursday, January 25, 2018 11:15 AM  
**To:** Ashley, Jackie <Ashley.Jackie@epa.gov>  
**Cc:** Jordan, Scott <Jordan.Scott@epa.gov>; Rodman, Sonja <Rodman.Sonja@epa.gov>  
**Subject:** Reclassification of Major Sources Comms Plan MK.docx

## Ex. 5 - Deliberative Process

**To:** Dalcher, Debra[dalcher.debra@epa.gov]; Lamason, Bill[Lamason.Bill@epa.gov]  
**Cc:** Mills, Kathy[Mills.Kathy@epa.gov]  
**From:** Ashley, Jackie  
**Sent:** Thur 1/25/2018 4:16:48 PM  
**Subject:** RE: Draft Comms Plan for Today's Memo - Please Review ASAP

THANKS

-----  
Jackie Ashley - US EPA - Office of Air Quality Planning and Standards - 919-541-7664 – ashley.jackie@epa.gov

**From:** Dalcher, Debra  
**Sent:** Thursday, January 25, 2018 11:16 AM  
**To:** Ashley, Jackie <Ashley.Jackie@epa.gov>; Lamason, Bill <Lamason.Bill@epa.gov>  
**Cc:** Mills, Kathy <Mills.Kathy@epa.gov>  
**Subject:** RE: Draft Comms Plan for Today's Memo - Please Review ASAP

## Ex. 5 - Deliberative Process

Thank you, Debra

**From:** Ashley, Jackie  
**Sent:** Thursday, January 25, 2018 11:15 AM  
**To:** Lamason, Bill <Lamason.Bill@epa.gov>  
**Cc:** Mills, Kathy <Mills.Kathy@epa.gov>; Dalcher, Debra <dalcher.debra@epa.gov>  
**Subject:** Re: Draft Comms Plan for Today's Memo - Please Review ASAP

### Ex. 5 - Deliberative Process

And will do. Thanks.

On Jan 25, 2018, at 11:13 AM, Lamason, Bill <[Lamason.Bill@epa.gov](mailto:Lamason.Bill@epa.gov)> wrote:

## Ex. 5 - Deliberative Process

**From:** Ashley, Jackie

**Sent:** Thursday, January 25, 2018 10:59 AM

**To:** Lamason, Bill <[Lamason.Bill@epa.gov](mailto:Lamason.Bill@epa.gov)>; Mills, Kathy <[Mills.Kathy@epa.gov](mailto:Mills.Kathy@epa.gov)>;  
Dalcher, Debra <[dalcher.debra@epa.gov](mailto:dalcher.debra@epa.gov)>

**Subject:** RE: Draft Comms Plan for Today's Memo - Please Review ASAP

## Ex. 5 - Deliberative Process

-----  
Jackie Ashley - US EPA - Office of Air Quality Planning and Standards - 919-541-7664 –  
[ashley.jackie@epa.gov](mailto:ashley.jackie@epa.gov)

**From:** Lamason, Bill

**Sent:** Thursday, January 25, 2018 10:57 AM

**To:** Ashley, Jackie <[Ashley.Jackie@epa.gov](mailto:Ashley.Jackie@epa.gov)>; Mills, Kathy <[Mills.Kathy@epa.gov](mailto:Mills.Kathy@epa.gov)>;  
 Dalcher, Debra <[dalcher.debra@epa.gov](mailto:dalcher.debra@epa.gov)>  
**Subject:** RE: Draft Comms Plan for Today's Memo - Please Review ASAP

## Ex. 5 - Deliberative Process

**From:** Ashley, Jackie  
**Sent:** Thursday, January 25, 2018 10:51 AM  
**To:** Cortelyou-Lee, Jan <[Cortelyou-Lee.Jan@epa.gov](mailto:Cortelyou-Lee.Jan@epa.gov)>; Mills, Kathy <[Mills.Kathy@epa.gov](mailto:Mills.Kathy@epa.gov)>; Dalcher, Debra <[dalcher.debra@epa.gov](mailto:dalcher.debra@epa.gov)>; Lamason, Bill <[Lamason.Bill@epa.gov](mailto:Lamason.Bill@epa.gov)>; DeLuca, Isabel <[DeLuca.Isabel@epa.gov](mailto:DeLuca.Isabel@epa.gov)>; Koerber, Mike <[Koerber.Mike@epa.gov](mailto:Koerber.Mike@epa.gov)>  
**Subject:** RE: Draft Comms Plan for Today's Memo - Please Review ASAP

Bill, Debra, KB –

## Ex. 5 - Deliberative Process

-----  
 Jackie Ashley - US EPA - Office of Air Quality Planning and Standards - 919-541-7664 –  
[ashley.jackie@epa.gov](mailto:ashley.jackie@epa.gov)

**From:** Cortelyou-Lee, Jan  
**Sent:** Thursday, January 25, 2018 10:02 AM  
**To:** Mills, Kathy <[Mills.Kathy@epa.gov](mailto:Mills.Kathy@epa.gov)>; Dalcher, Debra <[dalcher.debra@epa.gov](mailto:dalcher.debra@epa.gov)>; Lamason, Bill <[Lamason.Bill@epa.gov](mailto:Lamason.Bill@epa.gov)>; Ashley, Jackie <[Ashley.Jackie@epa.gov](mailto:Ashley.Jackie@epa.gov)>; DeLuca, Isabel <[DeLuca.Isabel@epa.gov](mailto:DeLuca.Isabel@epa.gov)>; Koerber, Mike <[Koerber.Mike@epa.gov](mailto:Koerber.Mike@epa.gov)>  
**Subject:** FW: Draft Comms Plan for Today's Memo - Please Review ASAP

## Ex. 6 - Personal Privacy

Folks – Jackie will cover this for the rest of the day. Please send her your comments.

## Ex. 5 - Deliberative Process

Jan Cortelyou-Lee

US Environmental Protection Agency

Office of Air Quality Planning and Standards

MD-C404-03

109 TW Alexander Drive

Research Triangle Park, NC 27709

Desk: 919-541-5393

Cell: 919-368-5734

**From:** Koerber, Mike

**Sent:** Thursday, January 25, 2018 8:56 AM

**To:** Cortelyou-Lee, Jan <[Cortelyou-Lee.Jan@epa.gov](mailto:Cortelyou-Lee.Jan@epa.gov)>; Dalcher, Debra <[dalcher.debra@epa.gov](mailto:dalcher.debra@epa.gov)>; Lamason, Bill <[Lamason.Bill@epa.gov](mailto:Lamason.Bill@epa.gov)>

**Cc:** Mills, Kathy <[Mills.Kathy@epa.gov](mailto:Mills.Kathy@epa.gov)>

**Subject:** RE: Draft Comms Plan for Today's Memo - Please Review ASAP

### Ex. 5 - Deliberative Process

**From:** Cortelyou-Lee, Jan

**Sent:** Thursday, January 25, 2018 8:42 AM

**To:** Dalcher, Debra <[dalcher.debra@epa.gov](mailto:dalcher.debra@epa.gov)>; Lamason, Bill <[Lamason.Bill@epa.gov](mailto:Lamason.Bill@epa.gov)>; Koerber, Mike <[Koerber.Mike@epa.gov](mailto:Koerber.Mike@epa.gov)>

**Cc:** Mills, Kathy <[Mills.Kathy@epa.gov](mailto:Mills.Kathy@epa.gov)>

**Subject:** Draft Comms Plan for Today's Memo - Please Review ASAP

### Ex. 5 - Deliberative Process

# **Ex. 5 - Deliberative Process**

Jan Cortelyou-Lee

US Environmental Protection Agency

Office of Air Quality Planning and Standards

MD-C404-03

109 TW Alexander Drive

Research Triangle Park, NC 27709

Desk: 919-541-5393

Cell: 919-368-5734

**To:** Lamason, Bill[Lamason.Bill@epa.gov]; Dalcher, Debra[dalcher.debra@epa.gov]  
**From:** Cortelyou-Lee, Jan  
**Sent:** Wed 1/24/2018 8:54:39 PM  
**Subject:** RE: Examples as Requested

## Ex. 5 - Deliberative Process

Jan Cortelyou-Lee

US Environmental Protection Agency

Office of Air Quality Planning and Standards

MD-C404-03

109 TW Alexander Drive

Research Triangle Park, NC 27709

Desk: 919-541-5393

Cell: 919-368-5734

**From:** Lamason, Bill  
**Sent:** Wednesday, January 24, 2018 3:25 PM  
**To:** Cortelyou-Lee, Jan <Cortelyou-Lee.Jan@epa.gov>; Dalcher, Debra  
<dalcher.debra@epa.gov>  
**Subject:** RE: Examples as Requested

## Ex. 5 - Deliberative Process



# Ex. 5 - Deliberative Process

Let us know if you have any questions.

Bill

**From:** Cortelyou-Lee, Jan  
**Sent:** Wednesday, January 24, 2018 3:04 PM  
**To:** Dalcher, Debra <[dalcher.debra@epa.gov](mailto:dalcher.debra@epa.gov)>  
**Cc:** Lamason, Bill <[Lamason.Bill@epa.gov](mailto:Lamason.Bill@epa.gov)>  
**Subject:** RE: Examples as Requested

Thanks Debra

## Ex. 5 - Deliberative Process

Jan Cortelyou-Lee

US Environmental Protection Agency

Office of Air Quality Planning and Standards

MD-C404-03

109 TW Alexander Drive

Research Triangle Park, NC 27709

Desk: 919-541-5393

Cell: 919-368-5734

**From:** Dalcher, Debra

**Sent:** Wednesday, January 24, 2018 12:08 PM

**To:** Cortelyou-Lee, Jan <[Cortelyou-Lee.Jan@epa.gov](mailto:Cortelyou-Lee.Jan@epa.gov)>

**Cc:** Lamason, Bill <[Lamason.Bill@epa.gov](mailto:Lamason.Bill@epa.gov)>

**Subject:** Examples as Requested

Thanks Jan. If you need anything else, please don't hesitate to reach out.

Debra

## Ex. 5 - Deliberative Process

# **Ex. 5 - Deliberative Process**

Debra S. Dalcher

U.S. EPA

Policy and Strategies Group

Sector Policies and Programs Division, OAQPS

109 T.W. Alexander Drive

Research Triangle Park, NC 27711

Phone: 919-541-2443

**To:** Dalcher, Debra[dalcher.debra@epa.gov]  
**Cc:** Lamason, Bill[Lamason.Bill@epa.gov]  
**From:** Cortelyou-Lee, Jan  
**Sent:** Wed 1/24/2018 8:03:51 PM  
**Subject:** RE: Examples as Requested

Thanks Debra

## Ex. 5 - Deliberative Process

Jan Cortelyou-Lee

US Environmental Protection Agency

Office of Air Quality Planning and Standards

MD-C404-03

109 TW Alexander Drive

Research Triangle Park, NC 27709

Desk: 919-541-5393

Cell: 919-368-5734

**From:** Dalcher, Debra  
**Sent:** Wednesday, January 24, 2018 12:08 PM  
**To:** Cortelyou-Lee, Jan <Cortelyou-Lee.Jan@epa.gov>  
**Cc:** Lamason, Bill <Lamason.Bill@epa.gov>  
**Subject:** Examples as Requested

Thanks Jan. If you need anything else, please don't hesitate to reach out.

Debra

## Ex. 5 - Deliberative Process

# **Ex. 5 - Deliberative Process**

Debra S. Dalcher

U.S. EPA

Policy and Strategies Group

Sector Policies and Programs Division, OAQPS

109 T.W. Alexander Drive

Research Triangle Park, NC 27711

Phone: 919-541-2443

**To:** Mills, Kathy[Mills.Kathy@epa.gov]; Dalcher, Debra[dalcher.debra@epa.gov]; Lamason, Bill[Lamason.Bill@epa.gov]; Ashley, Jackie[Ashley.Jackie@epa.gov]; DeLuca, Isabel[DeLuca.Isabel@epa.gov]; Koerber, Mike[Koerber.Mike@epa.gov]  
**From:** Cortelyou-Lee, Jan  
**Sent:** Thur 1/25/2018 3:02:01 PM  
**Subject:** FW: Draft Comms Plan for Today's Memo - Please Review ASAP  
Reclassification of Major Sources Comms Plan MK.docx

## Ex. 6 - Personal Privacy

Folks – Jackie will cover this for the rest of the day.  
Please send her your comments.

## Ex. 5 - Deliberative Process

Jan Cortelyou-Lee

US Environmental Protection Agency

Office of Air Quality Planning and Standards

MD-C404-03

109 TW Alexander Drive

Research Triangle Park, NC 27709

Desk: 919-541-5393

Cell: 919-368-5734

**From:** Koerber, Mike  
**Sent:** Thursday, January 25, 2018 8:56 AM  
**To:** Cortelyou-Lee, Jan <Cortelyou-Lee.Jan@epa.gov>; Dalcher, Debra <dalcher.debra@epa.gov>; Lamason, Bill <Lamason.Bill@epa.gov>  
**Cc:** Mills, Kathy <Mills.Kathy@epa.gov>  
**Subject:** RE: Draft Comms Plan for Today's Memo - Please Review ASAP

Minor edits attached

**From:** Cortelyou-Lee, Jan  
**Sent:** Thursday, January 25, 2018 8:42 AM  
**To:** Dalcher, Debra <[dalcher.debra@epa.gov](mailto:dalcher.debra@epa.gov)>; Lamason, Bill <[Lamason.Bill@epa.gov](mailto:Lamason.Bill@epa.gov)>;  
Koerber, Mike <[Koerber.Mike@epa.gov](mailto:Koerber.Mike@epa.gov)>  
**Cc:** Mills, Kathy <[Mills.Kathy@epa.gov](mailto:Mills.Kathy@epa.gov)>  
**Subject:** Draft Comms Plan for Today's Memo - Please Review ASAP

## Ex. 5 - Deliberative Process

Jan Cortelyou-Lee

US Environmental Protection Agency

Office of Air Quality Planning and Standards

MD-C404-03

109 TW Alexander Drive

Research Triangle Park, NC 27709

Desk: 919-541-5393

Cell: 919-368-5734

**To:** Koerber, Mike[Koerber.Mike@epa.gov]; Noonan, Jenny[Noonan.Jenny@epa.gov]; Lamason, Bill[Lamason.Bill@epa.gov]; Dalcher, Debra[dalcher.debra@epa.gov]; Mills, Kathy[Mills.Kathy@epa.gov]  
**Cc:** Cortelyou-Lee, Jan[Cortelyou-Lee.Jan@epa.gov]  
**From:** Ashley, Jackie  
**Sent:** Thur 1/25/2018 10:05:43 PM  
**Subject:** FINAL comms plan - for your files  
[Reclassification of Major Sources Comms Plan 3pm.docx](#)

## Ex. 5 - Deliberative Process

-----  
Jackie Ashley - US EPA - Office of Air Quality Planning and Standards - 919-541-7664 – ashley.jackie@epa.gov



**To:** Koerber, Mike[Koerber.Mike@epa.gov]; Lamason, Bill[Lamason.Bill@epa.gov]; Dalcher, Debra[dalcher.debra@epa.gov]; Mills, Kathy[Mills.Kathy@epa.gov]  
**Cc:** Bremer, Kristen[Bremer.Kristen@epa.gov]; Noonan, Jenny[Noonan.Jenny@epa.gov]  
**From:** Ashley, Jackie  
**Sent:** Thur 1/25/2018 7:30:39 PM  
**Subject:** FOR QUICK REVIEW - Press release, comm plan  
[Reclassification of Major Sources Comms Plan 2.pm.docx](#)

All –

## Ex. 5 - Deliberative Process

-----  
Jackie Ashley - US EPA - Office of Air Quality Planning and Standards - 919-541-7664 – ashley.jackie@epa.gov

**From:** DeLuca, Isabel  
**Sent:** Thursday, January 25, 2018 2:28 PM  
**To:** Ashley, Jackie <Ashley.Jackie@epa.gov>  
**Subject:** RE:

## Ex. 5 - Deliberative Process

**To:** StClair, Aimee[StClair.Aimee@epa.gov]  
**Cc:** Dalcher, Debra[dalcher.debra@epa.gov]; Lamason, Bill[Lamason.Bill@epa.gov]  
**From:** Barnett, Keith  
**Sent:** Mon 1/22/2018 9:38:27 PM  
**Subject:** FW: CMS ASSIGNMENT AL-18-000-3332  
[EPA response to Sens Barrasso Capito on onceinalwaysin.docx](#)

Dear Aimee:

## Ex. 5 - Deliberative Process

Keith Barnett

Minerals and Manufacturing Group Leader

919-541-5605

**From:** Lamason, Bill  
**Sent:** Monday, January 22, 2018 4:30 PM  
**To:** Dalcher, Debra <dalcher.debra@epa.gov>; Barnett, Keith <Barnett.Keith@epa.gov>  
**Subject:** RE: CMS ASSIGNMENT AL-18-000-3332

## Ex. 5 - Deliberative Process

**From:** Dalcher, Debra  
**Sent:** Monday, January 22, 2018 12:59 PM  
**To:** Barnett, Keith <Barnett.Keith@epa.gov>  
**Cc:** Lamason, Bill <Lamason.Bill@epa.gov>  
**Subject:** FW: CMS ASSIGNMENT AL-18-000-3332

Keith,

Attached is my note to Mariel.

Thank you for requesting the extension. I am copying Bill to keep him in the loop.

Thank you, Debra

**From:** Dalcher, Debra  
**Sent:** Monday, January 22, 2018 7:11 AM  
**To:** Morales, Mariel <[Morales.Mariel@epa.gov](mailto:Morales.Mariel@epa.gov)>  
**Subject:** RE: CMS ASSIGNMENT AL-18-000-3332

Mariel,

## Ex. 5 - Deliberative Process

Thank you, Debra

**From:** Morales, Mariel  
**Sent:** Friday, January 19, 2018 4:13 PM  
**To:** Dalcher, Debra <[dalcher.debra@epa.gov](mailto:dalcher.debra@epa.gov)>  
**Cc:** Lamason, Bill <[Lamason.Bill@epa.gov](mailto:Lamason.Bill@epa.gov)>; Barnett, Keith <[Barnett.Keith@epa.gov](mailto:Barnett.Keith@epa.gov)>

**Subject:** CMS ASSIGNMENT AL-18-000-3332

Hi Debra,

## **Ex. 5 - Deliberative Process**

Mariel Morales

Communications Specialist

OAQPS/SPPD

U.S. Environmental Protection Agency

(919) 541-9774

**To:** Torres, Elineth[Torres.Elineth@epa.gov]; Dalcher, Debra[dalcher.debra@epa.gov]  
**From:** Lamason, Bill  
**Sent:** Wed 10/4/2017 9:09:08 PM  
**Subject:** FW: ECOS is forming a workgroup on Once In, Always In

FYI. B

**From:** Tsirigotis, Peter  
**Sent:** Wednesday, October 04, 2017 5:04 PM  
**To:** Koerber, Mike <Koerber.Mike@epa.gov>  
**Cc:** Lamason, Bill <Lamason.Bill@epa.gov>  
**Subject:** Re: ECOS is forming a workgroup on Once In, Always In

## Ex. 5 - Deliberative Process

On Oct 4, 2017, at 4:57 PM, Koerber, Mike <Koerber.Mike@epa.gov> wrote:

**From:** Shaw, Betsy  
**Sent:** Wednesday, October 04, 2017 4:53 PM  
**To:** Page, Steve <Page.Steve@epa.gov>; Koerber, Mike <Koerber.Mike@epa.gov>  
**Cc:** Dunham, Sarah <Dunham.Sarah@epa.gov>  
**Subject:** FW: ECOS is forming a workgroup on Once In, Always In

Sorry – I missed this e-mail when it was first sent. Looks like this issue is back for another go.

**From:** Barbery, Andrea  
**Sent:** Friday, September 29, 2017 4:33 PM  
**To:** Shaw, Betsy <Shaw.Betsy@epa.gov>  
**Subject:** ECOS is forming a workgroup on Once In, Always In

Hi Betsy –

Wanted to be sure you were aware of ECOS' work on this; it was news to me. From today's ECOSWIRE:

## **ECOS Seeks Members for Workgroup on Once In, Always In**

ECOS is forming a workgroup to reengage in a conversation with U.S. EPA regarding the Once In, Always In policy under section 112 of the Clean Air Act and Maximum Available Control Technology (MACT) standards.

If you would like to join this group, please contact [Kelly Poole](#) of ECOS. [Poole]

Thanks,

Andrea Barbery

Office of Intergovernmental Relations

U.S. Environmental Protection Agency

202-564-1397

**To:** Dalcher, Debra[dalcher.debra@epa.gov]  
**From:** Debra Dalcher  
**Sent:** Tue 9/12/2017 10:19:21 PM  
**Subject:** Fwd: OIAI Backgrounder for discussion with GLs

----- Forwarded message -----

From: Lamason, Bill <[Lamason.Bill@epa.gov](mailto:Lamason.Bill@epa.gov)>  
Date: Tue, Sep 12, 2017 at 4:48 PM  
Subject: RE: OIAI Backgrounder for discussion with GLs  
To: Torres, Elineth <[Torres.Elineth@epa.gov](mailto:Torres.Elineth@epa.gov)>  
CC: Debra Dalcher <[dsdalcher@gmail.com](mailto:dsdalcher@gmail.com)>

Elineth,

## Ex. 5 - Deliberative Process

Hope this helps. Will continue to review tomorrow. Thanks!

Bill

**From:** Torres, Elineth  
**Sent:** Tuesday, September 12, 2017 9:52 AM  
**To:** Lamason, Bill <[Lamason.Bill@epa.gov](mailto:Lamason.Bill@epa.gov)>  
**Cc:** Dalcher, Debra <[dalcher.debra@epa.gov](mailto:dalcher.debra@epa.gov)>  
**Subject:** OIAI Backgrounder for discussion with GLs

Bill,

## Ex. 5 - Deliberative Process

Thanks,

Elineth Torres

OAQPS

919-541-4347



**To:** Lamason, Bill[Lamason.Bill@epa.gov]  
**Cc:** Dalcher, Debra[dalcher.debra@epa.gov]  
**From:** Torres, Elineth  
**Sent:** Tue 9/12/2017 2:25:13 PM  
**Subject:** Draft schedule OIAI  
[Draft Timeline OIAI 2017.docx](#)

Bill and Debra,

## Ex. 5 - Deliberative Process

Please let me know your comments/edits.

Thanks,

Elineth Torres

OAQPS

919-541-4347

**To:** Lamason, Bill[Lamason.Bill@epa.gov]  
**Cc:** Dalcher, Debra[dalcher.debra@epa.gov]  
**From:** Torres, Elineth  
**Sent:** Tue 9/12/2017 1:52:27 PM  
**Subject:** OIAI Backgrounder for discussion with GLs  
[OIAI Options Pager 09\\_05\\_17 Clean Working Doc.docx](#)

Bill,

## Ex. 5 - Deliberative Process

Thanks,

Elineth Torres

OAQPS

919-541-4347

**To:** Rodman, Sonja[Rodman.Sonja@epa.gov]; Vetter, Rick[Vetter.Rick@epa.gov]  
**Cc:** Lamason, Bill[Lamason.Bill@epa.gov]; McLamb, Marguerite[McLamb.Marguerite@epa.gov];  
Dalcher, Debra[dalcher.debra@epa.gov]  
**From:** Torres, Elineth  
**Sent:** Thur 9/7/2017 1:02:35 PM  
**Subject:** Updated OIAI memo for OGC review  
[Draft 2017 OIAI Memo post Peter feedback 09\\_05\\_17 CLEAN.docx](#)

Sonja and Rick,

## Ex. 5 - Attorney-Client/Deliberative Process

Thanks,

Elineth Torres

OAQPS

919-541-4347

**To:** Dalcher, Debra[dalcher.debra@epa.gov]  
**From:** Torres, Elineth  
**Sent:** Tue 9/5/2017 6:32:34 PM  
**Subject:** OIAI updated backgrounder  
[OIAI Options Pager 09\\_05\\_17 Clean Working Doc.docx](#)

Debra,

## Ex. 5 - Attorney-Client/Deliberative Process

Thanks,

Elineth Torres

OAQPS

919-541-4347

**To:** Lamason, Bill[Lamason.Bill@epa.gov]  
**Cc:** Dalcher, Debra[dalcher.debra@epa.gov]; McLamb, Marguerite[McLamb.Marguerite@epa.gov]  
**From:** Torres, Elineth  
**Sent:** Tue 9/5/2017 5:28:34 PM  
**Subject:** Updated OIAI memo 09\_05\_17  
[Draft 2017 OIAI Memo post Peter feedback 09\\_05\\_17 CLEAN.docx](#)

Bill,

## Ex. 5 - Deliberative Process

Thanks,

Elineth Torres

OAQPS

919-541-4347

**To:** Torres, Elineth[Torres.Elineth@epa.gov]  
**Cc:** Lamason, Bill[Lamason.Bill@epa.gov]; Dalcher, Debra[dalcher.debra@epa.gov]  
**From:** Godfrey, Janice  
**Sent:** Wed 9/20/2017 6:47:49 PM  
**Subject:** FW: OIAI example

Elineth should have been cc'd, not me.

Janice Godfrey

Environmental Engineer  
EPA, Office of Air Quality Planning and Standards  
Policy and Strategies Group  
Research Triangle Park, NC 27711  
(919) 541-3391

**From:** Lassiter, Penny  
**Sent:** Wednesday, September 20, 2017 2:43 PM  
**To:** Lamason, Bill <Lamason.Bill@epa.gov>  
**Cc:** Godfrey, Janice <Godfrey.Janice@epa.gov>  
**Subject:** OIAI example

Bill,

## Ex. 5 - Deliberative Process

# Ex. 5 - Deliberative Process

# **Ex. 5 - Deliberative Process**

# **Ex. 5 - Deliberative Process**

# **Ex. 5 - Deliberative Process**

Penny Lassiter

Group Leader

Refining and Chemicals Group

SPPD/OAQPS

U.S. Environmental Protection Agency

Mail Code: E143-01

Research Triangle Park, NC 27711

(919) 541-5396

[lassiter.penny@epa.gov](mailto:lassiter.penny@epa.gov)

**From:** Lamason, Bill

**Sent:** Tuesday, August 08, 2017 3:14 PM

**To:** Lassiter, Penny <[Lassiter.Penny@epa.gov](mailto:Lassiter.Penny@epa.gov)>

**Subject:** Draft 2017 OIAI Memorandum\_08082017\_markup.docx

## Ex. 5 - Deliberative Process



**To:** Dalcher, Debra[dalcher.debra@epa.gov]; Lassiter, Penny[Lassiter.Penny@epa.gov]; Eddinger, Jim[Eddinger.Jim@epa.gov]  
**From:** Barnett, Keith  
**Sent:** Thur 11/16/2017 2:45:14 PM  
**Subject:** RE: Current version of the examples in the draft OIAI memo - Comment today if possible

This looks fine to me.

Keith Barnett

Minerals and Manufacturing Group Leader

919-541-5605

**From:** Dalcher, Debra  
**Sent:** Thursday, November 16, 2017 7:37 AM  
**To:** Lassiter, Penny <Lassiter.Penny@epa.gov>; Eddinger, Jim <Eddinger.Jim@epa.gov>; Barnett, Keith <Barnett.Keith@epa.gov>  
**Subject:** Current version of the examples in the draft OIAI memo - Comment today if possible

## Ex. 5 - Deliberative Process

# **Ex. 5 - Deliberative Process**

Thank you, Debra

Debra S. Dalcher

U.S. EPA

Policy and Strategies Group

Sector Policies and Programs Division, OAQPS

109 T.W. Alexander Drive

Research Triangle Park, NC 27711

Phone: 919-541-2443

**To:** Dalcher, Debra[dalcher.debra@epa.gov]; Dunkins, Robin[Dunkins.Robin@epa.gov]  
**Cc:** Lamason, Bill[Lamason.Bill@epa.gov]; Shrager, Brian[Shrager.Brian@epa.gov]; Hirtz, Paula[Hirtz.Paula@epa.gov]; Whitfield, Kaye[Whitfield.Kaye@epa.gov]  
**From:** Barnett, Keith  
**Sent:** Tue 11/21/2017 2:27:56 PM  
**Subject:** RE: OIAI - Coating Sector Examples

## Ex. 5 - Deliberative Process

Keith Barnett

Minerals and Manufacturing Group Leader

919-541-5605

**From:** Dalcher, Debra  
**Sent:** Tuesday, November 21, 2017 7:42 AM  
**To:** Barnett, Keith <Barnett.Keith@epa.gov>; Dunkins, Robin <Dunkins.Robin@epa.gov>  
**Cc:** Lamason, Bill <Lamason.Bill@epa.gov>; Shrager, Brian <Shrager.Brian@epa.gov>; Hirtz, Paula <Hirtz.Paula@epa.gov>; Whitfield, Kaye <Whitfield.Kaye@epa.gov>  
**Subject:** RE: OIAI - Coating Sector Examples

Keith,

## Ex. 5 - Deliberative Process

Thank you, Debra

**From:** Barnett, Keith  
**Sent:** Monday, November 20, 2017 7:11 PM  
**To:** Dalcher, Debra <dalcher.debra@epa.gov>; Dunkins, Robin <Dunkins.Robin@epa.gov>  
**Cc:** Lamason, Bill <Lamason.Bill@epa.gov>; Shrager, Brian <Shrager.Brian@epa.gov>; Hirtz, Paula <Hirtz.Paula@epa.gov>; Whitfield, Kaye <Whitfield.Kaye@epa.gov>  
**Subject:** RE: OIAI - Coating Sector Examples

# Ex. 5 - Deliberative Process

Keith Barnett

Minerals and Manufacturing Group Leader

919-541-5605

**From:** Dalcher, Debra

**Sent:** Monday, November 20, 2017 10:39 AM

**To:** Barnett, Keith <[Barnett.Keith@epa.gov](mailto:Barnett.Keith@epa.gov)>; Dunkins, Robin <[Dunkins.Robin@epa.gov](mailto:Dunkins.Robin@epa.gov)>

**Cc:** Lamason, Bill <[Lamason.Bill@epa.gov](mailto:Lamason.Bill@epa.gov)>; Shrager, Brian <[Shrager.Brian@epa.gov](mailto:Shrager.Brian@epa.gov)>

**Subject:** OIAI - Coating Sector Examples

**Importance:** High

# Ex. 5 - Deliberative Process

Thank you, Debra

Debra S. Dalcher

U.S. EPA

Policy and Strategies Group

Sector Policies and Programs Division, OAQPS

109 T.W. Alexander Drive

Research Triangle Park, NC 27711

Phone: 919-541-2443

**To:** Dalcher, Debra[dalcher.debra@epa.gov]; Dunkins, Robin[Dunkins.Robin@epa.gov]  
**Cc:** Lamason, Bill[Lamason.Bill@epa.gov]; Shrager, Brian[Shrager.Brian@epa.gov]; Hirtz, Paula[Hirtz.Paula@epa.gov]; Whitfield, Kaye[Whitfield.Kaye@epa.gov]  
**From:** Barnett, Keith  
**Sent:** Tue 11/21/2017 12:11:21 AM  
**Subject:** RE: OIAI - Coating Sector Examples

## Ex. 5 - Deliberative Process

Keith Barnett

Minerals and Manufacturing Group Leader

919-541-5605

**From:** Dalcher, Debra  
**Sent:** Monday, November 20, 2017 10:39 AM  
**To:** Barnett, Keith <Barnett.Keith@epa.gov>; Dunkins, Robin <Dunkins.Robin@epa.gov>  
**Cc:** Lamason, Bill <Lamason.Bill@epa.gov>; Shrager, Brian <Shrager.Brian@epa.gov>  
**Subject:** OIAI - Coating Sector Examples  
**Importance:** High

## Ex. 5 - Deliberative Process

Thank you, Debra

Debra S. Dalcher

U.S. EPA

Policy and Strategies Group

Sector Policies and Programs Division, OAQPS

109 T.W. Alexander Drive

Research Triangle Park, NC 27711

Phone: 919-541-2443

**To:** Dalcher, Debra[dalcher.debra@epa.gov]  
**Cc:** Teal, Kim[Teal.Kim@epa.gov]  
**From:** Barnett, Keith  
**Sent:** Fri 12/1/2017 6:47:04 PM  
**Subject:** FW: OIAI - Examples of Sources Affected by Memo  
[WF Case Study on Benefits of Reformulated Coatings.pdf](#)

Dear Debra:

## Ex. 5 - Deliberative Process

Keith Barnett

Minerals and Manufacturing Group Leader

919-541-5605

**From:** Teal, Kim  
**Sent:** Friday, December 01, 2017 12:17 PM  
**To:** Barnett, Keith <Barnett.Keith@epa.gov>  
**Subject:** RE: OIAI - Examples of Sources Affected by Memo

Keith,



## Ex. 5 - Deliberative Process

**From:** Barnett, Keith  
**Sent:** Thursday, November 30, 2017 2:23 PM  
**To:** Teal, Kim <[Teal.Kim@epa.gov](mailto:Teal.Kim@epa.gov)>  
**Subject:** FW: OIAI - Examples of Sources Affected by Memo  
**Importance:** High

Dear Kim:

## Ex. 5 - Deliberative Process

Keith Barnett

Minerals and Manufacturing Group Leader

919-541-5605

**From:** Dalcher, Debra  
**Sent:** Thursday, November 30, 2017 12:13 PM  
**To:** Barnett, Keith <[Barnett.Keith@epa.gov](mailto:Barnett.Keith@epa.gov)>  
**Cc:** Lamason, Bill <[Lamason.Bill@epa.gov](mailto:Lamason.Bill@epa.gov)>  
**Subject:** OIAI - Examples of Sources Affected by Memo  
**Importance:** High

Keith,

## **Ex. 5 - Deliberative Process**

Thank you, Debra

**To:** Dalcher, Debra[dalcher.debra@epa.gov]  
**From:** Bernales, Barbara  
**Sent:** Tue 11/7/2017 4:55:36 PM  
**Subject:** RE: FDMS User Account Change Request (OIAI Rulemaking Docket)  
Full Export EPA-HQ-OAR-2004-0094-PUBLICSUBMISSIONS-Posted-Documents-11\_07\_2017-10\_50\_AM.zip  
BASIC Save Search Results EPA-HQ-OAR-2004-0094.xlsx

Good morning Debra!

I think that I was finally able to work out those kinks (Phew!). And, as promised, I am attaching two *Save Search Results* files for EPA Docket ID OAR-2004-0094. The first is the *Basic* and the second if the *Full Export*. As a reminder the *Basic* captures select metadata from FDMS' Docket Tree results window and usually contains less than 10 metadata fields while the *Full Export* allows you to export all of the metadata fields--excluding file attachments. I think that the second option retrieves similar results as the bulk extract and requesting it is really simple. So, please let me know if you'd be interested in learning how to retrieve this report on demand.

R\

Barbara Bernales

Regulatory Support Division

Office of Enterprise Information Programs

Office of Environmental Information

U.S. Environmental Protection Agency

202-566-2985

**From:** Bernales, Barbara  
**Sent:** Monday, November 6, 2017 1:20 PM  
**To:** Dalcher, Debra <dalcher.debra@epa.gov>  
**Subject:** RE: FDMS User Account Change Request (OIAI Rulemaking Docket)

You are very welcome!

I tried, also, to attach the Docket 'Save Search Results' report but had some technical difficulties. I just wanted to send it to you as a comparison so that if (in the future) you wanted the same information sooner, then you could retrieve it by requesting this report.

I will send it to you later once I've worked out the kinks.

Barbara Bernales

Regulatory Support Division

Office of Enterprise Information Programs

Office of Environmental Information

U.S. Environmental Protection Agency

202-566-2985

**From:** Dalcher, Debra

**Sent:** Monday, November 6, 2017 12:46 PM

**To:** Bernales, Barbara <[bernales.barbara@epa.gov](mailto:bernales.barbara@epa.gov)>

**Cc:** Scully, Carolyn <[Scully.Carolyn@epa.gov](mailto:Scully.Carolyn@epa.gov)>; Torres, Elineth <[Torres.Elineth@epa.gov](mailto:Torres.Elineth@epa.gov)>; Lamason, Bill <[Lamason.Bill@epa.gov](mailto:Lamason.Bill@epa.gov)>

**Subject:** RE: FDMS User Account Change Request (OIAI Rulemaking Docket)

Barbara, this is so helpful. Thank you so much. Debra

**From:** Bernales, Barbara

**Sent:** Monday, November 06, 2017 12:45 PM

**To:** Dalcher, Debra <[dalcher.debra@epa.gov](mailto:dalcher.debra@epa.gov)>

**Cc:** Scully, Carolyn <[Scully.Carolyn@epa.gov](mailto:Scully.Carolyn@epa.gov)>; Torres, Elineth <[Torres.Elineth@epa.gov](mailto:Torres.Elineth@epa.gov)>; Lamason, Bill <[Lamason.Bill@epa.gov](mailto:Lamason.Bill@epa.gov)>

**Subject:** RE: FDMS User Account Change Request (OIAI Rulemaking Docket)

Debra,

Attached is the Bulk Extract that I requested on your behalf. Please follow the instructions within to open the file.

Barbara Bernales

Regulatory Support Division

Office of Enterprise Information Programs

Office of Environmental Information

U.S. Environmental Protection Agency

202-566-2985

**From:** Dalcher, Debra

**Sent:** Monday, November 6, 2017 11:37 AM

**To:** Bernales, Barbara <[bernales.barbara@epa.gov](mailto:bernales.barbara@epa.gov)>

**Cc:** Scully, Carolyn <[Scully.Carolyn@epa.gov](mailto:Scully.Carolyn@epa.gov)>; Torres, Elineth <[Torres.Elineth@epa.gov](mailto:Torres.Elineth@epa.gov)>; Lamason, Bill <[Lamason.Bill@epa.gov](mailto:Lamason.Bill@epa.gov)>

**Subject:** RE: FDMS User Account Change Request (OIAI Rulemaking Docket)

Thank you again Barbara. We appreciate the support.

**From:** Bernales, Barbara

**Sent:** Monday, November 06, 2017 11:17 AM

**To:** Dalcher, Debra <[dalcher.debra@epa.gov](mailto:dalcher.debra@epa.gov)>

**Cc:** Scully, Carolyn <[Scully.Carolyn@epa.gov](mailto:Scully.Carolyn@epa.gov)>; Torres, Elineth <[Torres.Elineth@epa.gov](mailto:Torres.Elineth@epa.gov)>;

Lamason, Bill <[Lamason.Bill@epa.gov](mailto:Lamason.Bill@epa.gov)>

**Subject:** RE: FDMS User Account Change Request (OIAI Rulemaking Docket)

Thanks Debra, I've requested the extract and will forward it to you once I've received it.

Barbara Bernales

Regulatory Support Division

Office of Enterprise Information Programs

Office of Environmental Information

U.S. Environmental Protection Agency

202-566-2985

**From:** Dalcher, Debra

**Sent:** Monday, November 6, 2017 9:29 AM

**To:** Bernales, Barbara <[bernales.barbara@epa.gov](mailto:bernales.barbara@epa.gov)>

**Cc:** Scully, Carolyn <[Scully.Carolyn@epa.gov](mailto:Scully.Carolyn@epa.gov)>; Torres, Elineth <[Torres.Elineth@epa.gov](mailto:Torres.Elineth@epa.gov)>;

Lamason, Bill <[Lamason.Bill@epa.gov](mailto:Lamason.Bill@epa.gov)>

**Subject:** RE: FDMS User Account Change Request (OIAI Rulemaking Docket)

**Importance:** High

Barbara,

## Ex. 5 - Deliberative Process

If you need a date range to do the search we believe that the following date range should work:  
Jan 1, 2005- Dec 31, 2007

Thank you, Debra

**From:** Bernales, Barbara  
**Sent:** Monday, November 06, 2017 9:06 AM  
**To:** Dalcher, Debra <[dalcher.debra@epa.gov](mailto:dalcher.debra@epa.gov)>  
**Cc:** Scully, Carolyn <[Scully.Carolyn@epa.gov](mailto:Scully.Carolyn@epa.gov)>; Torres, Elineth <[Torres.Elineth@epa.gov](mailto:Torres.Elineth@epa.gov)>  
**Subject:** RE: FDMS User Account Change Request (OIAI Rulemaking Docket)

Good Morning Debra!

Could you provide me with a specific start and end date?

Thanks!

Barbara Bernales

Regulatory Support Division

Office of Enterprise Information Programs

Office of Environmental Information

U.S. Environmental Protection Agency

202-566-2985

**From:** Dalcher, Debra  
**Sent:** Monday, November 6, 2017 8:20 AM  
**To:** Bernales, Barbara <[bernales.barbara@epa.gov](mailto:bernales.barbara@epa.gov)>  
**Cc:** Scully, Carolyn <[Scully.Carolyn@epa.gov](mailto:Scully.Carolyn@epa.gov)>; Torres, Elineth <[Torres.Elineth@epa.gov](mailto:Torres.Elineth@epa.gov)>  
**Subject:** FW: FDMS User Account Change Request (OIAI Rulemaking Docket)

Good Morning Barbara

I am wondering if you could help with something. We submitted the attached request on 1 Nov for a docket extraction (an older docket, but not a large one). We submitted another a few days later and received that one already ☺.

There is some urgency associated with the above request and we are hoping someone could check to make sure it was received and also provide an update on when we can expect to receive the files.

If this does not fall in your lane, please just let me know who I can touch base with.

Thanks so much, Debra

**From:** Torres, Elineth  
**Sent:** Wednesday, November 01, 2017 7:50 AM  
**To:** FDMS <[FDMS@epa.gov](mailto:FDMS@epa.gov)>  
**Cc:** Dalcher, Debra <[dalcher.debra@epa.gov](mailto:dalcher.debra@epa.gov)>  
**Subject:** FDMS User Account Change Request

See attached request.

Thanks.

Elineth Torres



OAQPS

919-541-4347

**To:** Smith, Korbin[smith.korbin@epa.gov]  
**Cc:** Dalcher, Debra[dalcher.debra@epa.gov]  
**From:** Torres, Elineth  
**Sent:** Tue 10/10/2017 3:54:40 PM  
**Subject:** RE: Friction Reg Text red-line strikeouts  
reg text redline strikeouts QQQQQ et 10\_03\_17.docx  
SSM Preamble 9.27.17 Et review 10\_4\_17.docx

Korbin,

## Ex. 5 - Deliberative Process

Elineth Torres

OAQPS

919-541-4347

**From:** Smith, Korbin  
**Sent:** Friday, September 29, 2017 2:20 PM  
**To:** Torres, Elineth <Torres.Elineth@epa.gov>  
**Subject:** Friction Reg Text red-line strikeouts

Elineth,

## Ex. 5 - Deliberative Process

Korbin Smith BS, MPH

Physical Scientist

U.S. EPA OAR/OAQPS

Sector Policies and Programs Division

109 TW Alexander Drive

Mail Code D243-04

Research Triangle Park, North Carolina 27711

(919) 541-2416

**To:** Srivastava, Ravi[Srivastava.Ravi@epa.gov]  
**From:** Dalcher, Debra  
**Sent:** Mon 11/27/2017 12:52:04 PM  
**Subject:** RE: Error messages when trying to use new build - see attached

Thank you Ravi!

**From:** Srivastava, Ravi  
**Sent:** Wednesday, November 22, 2017 9:46 AM  
**To:** Dalcher, Debra <dalcher.debra@epa.gov>  
**Subject:** RE: Error messages when trying to use new build - see attached

Hi Debra,

I have replaced the Locker file at G:\User\Share\\_\_PSG\Once In Always In\Ravi\_OIAI. If you plan to come to work, please use this new Locker file. Alternatively, if you have your laptop at home with yesterday's build, call me and I can help you fix it.

If I don't see you today, have a great Thanksgiving with your family!

Ravi

**From:** Dalcher, Debra  
**Sent:** Tuesday, November 21, 2017 3:05 PM  
**To:** Srivastava, Ravi <[Srivastava.Ravi@epa.gov](mailto:Srivastava.Ravi@epa.gov)>  
**Subject:** RE: Error messages when trying to use new build - see attached

Not a problem. Thanks, Debra

**From:** Srivastava, Ravi

**Sent:** Tuesday, November 21, 2017 3:04 PM

**To:** Dalcher, Debra <[dalcher.debra@epa.gov](mailto:dalcher.debra@epa.gov)>

**Subject:** Re: Error messages when trying to use new build - see attached

Sorry- I will fix tomorrow morning.

Sent from my iPhone

On Nov 21, 2017, at 2:31 PM, Dalcher, Debra <[dalcher.debra@epa.gov](mailto:dalcher.debra@epa.gov)> wrote:

## **Ex. 5 - Deliberative Process**

Thanks, Ravi

<UNTITLED.pptx>

**To:** Vetter, Rick[Vetter.Rick@epa.gov]; McLamb, Marguerite[McLamb.Marguerite@epa.gov]; Rodman, Sonja[Rodman.Sonja@epa.gov]  
**Cc:** Torres, Elineth[Torres.Elineth@epa.gov]; Lamason, Bill[Lamason.Bill@epa.gov]  
**Bcc:** Dalcher, Debra[dalcher.debra@epa.gov]  
**From:** Dalcher, Debra  
**Sent:** Thur 11/16/2017 7:27:27 PM  
**Subject:** RE: Current Version of Revision Memo

Rick,

## Ex. 5 - Attorney Client

Thank you everyone, Debra

**From:** Vetter, Rick  
**Sent:** Thursday, November 16, 2017 2:15 PM  
**To:** Dalcher, Debra <dalcher.debra@epa.gov>; McLamb, Marguerite <McLamb.Marguerite@epa.gov>; Lamason, Bill <Lamason.Bill@epa.gov>; Rodman, Sonja <Rodman.Sonja@epa.gov>  
**Cc:** Torres, Elineth <Torres.Elineth@epa.gov>  
**Subject:** RE: Current Version of Revision Memo

I apologize, Debra. Looking at it more closely, I realized that you have filled in the blanks toward the end of the memo. I didn't see any text that looked new when I first looked at it.

Rick

## Richard H. Vetter

Richard H. Vetter

Attorney Advisor

Air & Radiation Law Office

Office of General Counsel

[vetter.rick@epa.gov](mailto:vetter.rick@epa.gov)

919-541-2127

**From:** Dalcher, Debra

**Sent:** Thursday, November 16, 2017 1:40 PM

**To:** Vetter, Rick <[Vetter.Rick@epa.gov](mailto:Vetter.Rick@epa.gov)>; McLamb, Marguerite  
<[McLamb.Marguerite@epa.gov](mailto:McLamb.Marguerite@epa.gov)>; Lamason, Bill <[Lamason.Bill@epa.gov](mailto:Lamason.Bill@epa.gov)>; Rodman, Sonja  
<[Rodman.Sonja@epa.gov](mailto:Rodman.Sonja@epa.gov)>

**Cc:** Torres, Elineth <[Torres.Elineth@epa.gov](mailto:Torres.Elineth@epa.gov)>

**Subject:** RE: Current Version of Revision Memo

Rick,

This is the current version.

Thank you, Debra

**From:** Vetter, Rick

**Sent:** Thursday, November 16, 2017 1:30 PM

**To:** Dalcher, Debra <[dalcher.debra@epa.gov](mailto:dalcher.debra@epa.gov)>; McLamb, Marguerite  
<[McLamb.Marguerite@epa.gov](mailto:McLamb.Marguerite@epa.gov)>; Lamason, Bill <[Lamason.Bill@epa.gov](mailto:Lamason.Bill@epa.gov)>; Rodman, Sonja  
<[Rodman.Sonja@epa.gov](mailto:Rodman.Sonja@epa.gov)>

**Cc:** Torres, Elineth <[Torres.Elineth@epa.gov](mailto:Torres.Elineth@epa.gov)>  
**Subject:** RE: Current Version of Revision Memo

Debra,

# Ex. 5 - Attorney Client

Rick

Richard H. Vetter

Richard H. Vetter

Attorney Advisor

Air & Radiation Law Office

Office of General Counsel

[vetter.rick@epa.gov](mailto:vetter.rick@epa.gov)

919-541-2127

**From:** Dalcher, Debra

**Sent:** Monday, November 13, 2017 4:09 PM

**To:** McLamb, Marguerite <[McLamb.Marguerite@epa.gov](mailto:McLamb.Marguerite@epa.gov)>; Vetter, Rick  
<[Vetter.Rick@epa.gov](mailto:Vetter.Rick@epa.gov)>; Lamason, Bill <[Lamason.Bill@epa.gov](mailto:Lamason.Bill@epa.gov)>; Rodman, Sonja  
<[Rodman.Sonja@epa.gov](mailto:Rodman.Sonja@epa.gov)>

**Cc:** Dalcher, Debra <[dalcher.debra@epa.gov](mailto:dalcher.debra@epa.gov)>; Torres, Elineth <[Torres.Elineth@epa.gov](mailto:Torres.Elineth@epa.gov)>

**Subject:** Current Version of Revision Memo

**Importance:** High



# Ex. 5 - Attorney Client

Thank you, Debra

Debra S. Dalcher

U.S. EPA

Policy and Strategies Group

Sector Policies and Programs Division, OAQPS

109 T.W. Alexander Drive

Research Triangle Park, NC 27711

Phone: 919-541-2443

**To:** Srivastava, Ravi[Srivastava.Ravi@epa.gov]  
**From:** Dalcher, Debra  
**Sent:** Tue 11/21/2017 8:04:52 PM  
**Subject:** RE: Error messages when trying to use new build - see attached

Not a problem. Thanks, Debra

**From:** Srivastava, Ravi  
**Sent:** Tuesday, November 21, 2017 3:04 PM  
**To:** Dalcher, Debra <dalcher.debra@epa.gov>  
**Subject:** Re: Error messages when trying to use new build - see attached

Sorry- I will fix tomorrow morning.

Sent from my iPhone

On Nov 21, 2017, at 2:31 PM, Dalcher, Debra <dalcher.debra@epa.gov> wrote:

## Ex. 5 - Deliberative Process

Thanks, Ravi

<UNTITLED.pptx>

**To:** Eck, Janet[Eck.Janet@epa.gov]  
**Bcc:** Dalcher, Debra[dalcher.debra@epa.gov]  
**From:** Dalcher, Debra  
**Sent:** Mon 1/22/2018 6:39:59 PM  
**Subject:** FW: OIAO - Example of FR Notice from Sonja  
[2017-26422.pdf](#)  
[FRN OIAI Guidance Memorandum 1\\_19\\_18+SJJ 1.22.18.docx](#)

Janet,

## Ex. 5 - Attorney Client

Thank you, Debra

-----Original Message-----

**From:** Jordan, Scott  
**Sent:** Monday, January 22, 2018 1:10 PM  
**To:** Rodman, Sonja <Rodman.Sonja@epa.gov>; Dalcher, Debra <dalcher.debra@epa.gov>  
**Subject:** OIAO - Example of FR Notice from Sonja

## Ex. 5 - Attorney Client

Scott Jordan  
Air and Radiation Law Office  
Office of General Counsel  
202-564-7508

-----Original Message-----

**From:** Rodman, Sonja  
**Sent:** Monday, January 22, 2018 12:42 PM  
**To:** Jordan, Scott <Jordan.Scott@epa.gov>  
**Subject:** FW: Notice of availability of our statutory interpretation in the RFS program

## Ex. 5 - Attorney Client

Sonja L. Rodman  
Air Toxics, Consumer Protection and Indoor Air Practice Group  
(202) 564-4079

CONFIDENTIALITY NOTICE: This message may contain sensitive, privileged information covered by the deliberative process, attorney-client and/or attorney work product privileges. Do not release this message under FOIA without appropriate review. If you are not the intended recipient, or the employee or agent responsible to deliver it to the intended recipient, please contact the sender and delete all copies.

-----Original Message-----

From: Orlin, David  
Sent: Monday, January 22, 2018 12:34 PM  
To: Rodman, Sonja <Rodman.Sonja@epa.gov>  
Cc: Li, Ryland (Shengzhi) <Li.Ryland@epa.gov>  
Subject: Notice of availability of our statutory interpretation in the RFS program

<https://www.gpo.gov/fdsys/pkg/FR-2017-12-12/pdf/2017-26422.pdf>

**To:** Morales, Mariel[Morales.Mariel@epa.gov]  
**Bcc:** Lamason, Bill[Lamason.Bill@epa.gov]  
**From:** Dalcher, Debra  
**Sent:** Wed 12/13/2017 12:14:59 PM  
**Subject:** RE: OIAI 1-pager

## Ex. 5 - Deliberative Process

Debra

**From:** Morales, Mariel  
**Sent:** Tuesday, December 12, 2017 1:08 PM  
**To:** Dalcher, Debra <dalcher.debra@epa.gov>  
**Subject:** OIAI 1-pager

Hi Debra,

## Ex. 5 - Deliberative Process

Mariel Morales

Communications Specialist

OAQPS/SPPD

U.S. Environmental Protection Agency

(919) 541-9774

**To:** Jordan, Scott[Jordan.Scott@epa.gov]  
**From:** Dalcher, Debra  
**Sent:** Tue 1/9/2018 4:54:01 PM  
**Subject:** RE: OIAI Rulemaking Docket



**From:** Jordan, Scott  
**Sent:** Tuesday, January 09, 2018 11:28 AM  
**To:** Dalcher, Debra <dalcher.debra@epa.gov>  
**Subject:** Re: OIAI Rulemaking Docket

# Ex. 5 - Attorney Client

Scott Jordan

Air and Radiation Law Office

Office of General Counsel

202-564-7508

---

**From:** Dalcher, Debra  
**Sent:** Tuesday, January 9, 2018 11:24 AM  
**To:** Jordan, Scott  
**Subject:** RE: OIAI Rulemaking Docket

# Ex. 5 - Attorney Client

**From:** Jordan, Scott  
**Sent:** Tuesday, January 09, 2018 11:22 AM  
**To:** Dalcher, Debra <[dalcher.debra@epa.gov](mailto:dalcher.debra@epa.gov)>  
**Subject:** Re: OIAI Rulemaking Docket

# Ex. 5 - Attorney Client

Scott Jordan

Air and Radiation Law Office

Office of General Counsel

202-564-7508

---

**From:** Dalcher, Debra  
**Sent:** Tuesday, January 9, 2018 11:12 AM  
**To:** Jordan, Scott  
**Subject:** OIAI Rulemaking Docket

Scott,

# **Ex. 5 - Attorney Client**

If you are not the right person to ask, please let me know.

Thanks, Debra

Debra S. Dalcher

U.S. EPA

Policy and Strategies Group

Sector Policies and Programs Division, OAQPS

109 T.W. Alexander Drive

Research Triangle Park, NC 27711

Phone: 919-541-2443



**To:** Rodman, Sonja[Rodman.Sonja@epa.gov]  
**Cc:** Jordan, Scott[Jordan.Scott@epa.gov]  
**From:** Dalcher, Debra  
**Sent:** Wed 1/24/2018 3:24:39 PM  
**Subject:** FW: FRN Notice of Memorandum Availability 1\_23\_18\_JE DD.docx  
[FRN Notice of Memorandum Availability 1\\_23\\_18\\_JE DD.docx](#)

Sonja,

## Ex. 5 - Attorney Client

Thank you, Debra

**From:** Dalcher, Debra  
**Sent:** Wednesday, January 24, 2018 10:08 AM  
**To:** Harlow, David <harlow.david@epa.gov>; Jordan, Scott <Jordan.Scott@epa.gov>; Culligan, Kevin <Culligan.Kevin@epa.gov>; Lamason, Bill <Lamason.Bill@epa.gov>  
**Cc:** Dalcher, Debra <dalcher.debra@epa.gov>  
**Subject:** FRN Notice of Memorandum Availability 1\_23\_18\_JE DD.docx

David,

## Ex. 5 - Attorney-Client/Deliberative Process

Thank you, Debra

**To:** Cortelyou-Lee, Jan[Cortelyou-Lee.Jan@epa.gov]; Lamason, Bill[Lamason.Bill@epa.gov]; Koerber, Mike[Koerber.Mike@epa.gov]  
**Cc:** Mills, Kathy[Mills.Kathy@epa.gov]  
**From:** Dalcher, Debra  
**Sent:** Thur 1/25/2018 1:57:21 PM  
**Subject:** RE: Draft Comms Plan for Today's Memo - Please Review ASAP

## Ex. 5 - Deliberative Process

Debra

**From:** Cortelyou-Lee, Jan  
**Sent:** Thursday, January 25, 2018 8:54 AM  
**To:** Dalcher, Debra <dalcher.debra@epa.gov>; Lamason, Bill <Lamason.Bill@epa.gov>; Koerber, Mike <Koerber.Mike@epa.gov>  
**Cc:** Mills, Kathy <Mills.Kathy@epa.gov>  
**Subject:** RE: Draft Comms Plan for Today's Memo - Please Review ASAP

## Ex. 5 - Deliberative Process

Jan Cortelyou-Lee

US Environmental Protection Agency

Office of Air Quality Planning and Standards

MD-C404-03

109 TW Alexander Drive

Research Triangle Park, NC 27709

Desk: 919-541-5393

Cell: 919-368-5734

**From:** Cortelyou-Lee, Jan

**Sent:** Thursday, January 25, 2018 8:42 AM

**To:** Dalcher, Debra <[dalcher.debra@epa.gov](mailto:dalcher.debra@epa.gov)>; Lamason, Bill <[Lamason.Bill@epa.gov](mailto:Lamason.Bill@epa.gov)>;

Koerber, Mike <[Koerber.Mike@epa.gov](mailto:Koerber.Mike@epa.gov)>

**Cc:** Mills, Kathy <[Mills.Kathy@epa.gov](mailto:Mills.Kathy@epa.gov)>

**Subject:** Draft Comms Plan for Today's Memo - Please Review ASAP

## Ex. 5 - Deliberative Process

# **Ex. 5 - Deliberative Process**

Jan Cortelyou-Lee

US Environmental Protection Agency

Office of Air Quality Planning and Standards

MD-C404-03

109 TW Alexander Drive

Research Triangle Park, NC 27709

Desk: 919-541-5393

Cell: 919-368-5734

**To:** Eck, Janet[Eck.Janet@epa.gov]  
**From:** Dalcher, Debra  
**Sent:** Thur 1/25/2018 6:42:03 PM  
**Subject:** FW: OIAI Memo - Final OGC Comments

Janet,

Here is our release from OGC. Please print from folder.

**From:** Jordan, Scott  
**Sent:** Thursday, January 25, 2018 1:17 PM  
**To:** Dalcher, Debra <dalcher.debra@epa.gov>; Lamason, Bill <Lamason.Bill@epa.gov>; Rodman, Sonja <Rodman.Sonja@epa.gov>; Culligan, Kevin <Culligan.Kevin@epa.gov>  
**Subject:** OIAI Memo - Final OGC Comments

Debra and All –

# Ex. 5 - Attorney Client

If you have any questions, please let us know.

Scott Jordan

Air and Radiation Law Office

Office of General Counsel

202-564-7508

**To:** Vetter, Rick[Vetter.Rick@epa.gov]; McLamb, Marguerite[McLamb.Marguerite@epa.gov]; Lamason, Bill[Lamason.Bill@epa.gov]; Rodman, Sonja[Rodman.Sonja@epa.gov]  
**Cc:** Torres, Elineth[Torres.Elineth@epa.gov]  
**Bcc:** Dalcher, Debra[dalcher.debra@epa.gov]  
**From:** Dalcher, Debra  
**Sent:** Thur 11/16/2017 6:40:27 PM  
**Subject:** RE: Current Version of Revision Memo  
Memo replacing OIAI with proposed 2007 interpretation 11 15 17 2PM.docx

Rick,

## Ex. 5 - Attorney Client

Thank you, Debra

**From:** Vetter, Rick  
**Sent:** Thursday, November 16, 2017 1:30 PM  
**To:** Dalcher, Debra <dalcher.debra@epa.gov>; McLamb, Marguerite <McLamb.Marguerite@epa.gov>; Lamason, Bill <Lamason.Bill@epa.gov>; Rodman, Sonja <Rodman.Sonja@epa.gov>  
**Cc:** Torres, Elineth <Torres.Elineth@epa.gov>  
**Subject:** RE: Current Version of Revision Memo

Debra,

## Ex. 5 - Attorney Client

Rick

Richard H. Vetter

Richard H. Vetter

Attorney Advisor

Air & Radiation Law Office

Office of General Counsel

[vetter.rick@epa.gov](mailto:vetter.rick@epa.gov)

919-541-2127

**From:** Dalcher, Debra

**Sent:** Monday, November 13, 2017 4:09 PM

**To:** McLamb, Marguerite <[McLamb.Marguerite@epa.gov](mailto:McLamb.Marguerite@epa.gov)>; Vetter, Rick  
<[Vetter.Rick@epa.gov](mailto:Vetter.Rick@epa.gov)>; Lamason, Bill <[Lamason.Bill@epa.gov](mailto:Lamason.Bill@epa.gov)>; Rodman, Sonja  
<[Rodman.Sonja@epa.gov](mailto:Rodman.Sonja@epa.gov)>

**Cc:** Dalcher, Debra <[dalcher.debra@epa.gov](mailto:dalcher.debra@epa.gov)>; Torres, Elineth <[Torres.Elineth@epa.gov](mailto:Torres.Elineth@epa.gov)>

**Subject:** Current Version of Revision Memo

**Importance:** High

# Ex. 5 - Attorney Client

Thank you, Debra

Debra S. Dalcher

U.S. EPA

Policy and Strategies Group



Sector Policies and Programs Division, OAQPS

109 T.W. Alexander Drive

Research Triangle Park, NC 27711

Phone: 919-541-2443

**To:** Teal, Kim[Teal.Kim@epa.gov]  
**From:** Dalcher, Debra  
**Sent:** Mon 12/4/2017 7:21:36 PM  
**Subject:** RE: Revised OIAI Examples 12 3 17.docx

Thank you Kim. Debra

**From:** Teal, Kim  
**Sent:** Monday, December 04, 2017 2:17 PM  
**To:** Dalcher, Debra <dalcher.debra@epa.gov>  
**Subject:** FW: Revised OIAI Examples 12 3 17.docx  
**Importance:** High

Debra,

## Ex. 5 - Deliberative Process

**From:** Barnett, Keith  
**Sent:** Monday, December 04, 2017 8:09 AM  
**To:** Teal, Kim <Teal.Kim@epa.gov>  
**Subject:** FW: Revised OIAI Examples 12 3 17.docx  
**Importance:** High

Let Debra know if you have comments.

Keith Barnett

Minerals and Manufacturing Group Leader

919-541-5605

**From:** Dalcher, Debra

**Sent:** Monday, December 04, 2017 8:07 AM

**To:** Lassiter, Penny <[Lassiter.Penny@epa.gov](mailto:Lassiter.Penny@epa.gov)>; Barnett, Keith <[Barnett.Keith@epa.gov](mailto:Barnett.Keith@epa.gov)>

**Cc:** Dalcher, Debra <[dalcher.debra@epa.gov](mailto:dalcher.debra@epa.gov)>; Lamason, Bill <[Lamason.Bill@epa.gov](mailto:Lamason.Bill@epa.gov)>

**Subject:** Revised OIAI Examples 12 3 17.docx

**Importance:** High

Penny, Keith

## Ex. 5 - Deliberative Process

We are reviewing the memo with Peter later this morning.

Thank you, Debra

**To:** Modak, Nabanita[Modak.Nabanita@epa.gov]  
**Cc:** Shrager, Brian[Shrager.Brian@epa.gov]  
**Bcc:** Dalcher, Debra[dalcher.debra@epa.gov]  
**From:** Dalcher, Debra  
**Sent:** Tue 11/21/2017 7:47:03 PM  
**Subject:** RE: See Kevin's bullet below

Nabanita,

## Ex. 5 - Deliberative Process

Thank you, Debra

**From:** Shrager, Brian  
**Sent:** Tuesday, November 21, 2017 2:26 PM  
**To:** Dalcher, Debra <dalcher.debra@epa.gov>  
**Cc:** Modak, Nabanita <Modak.Nabanita@epa.gov>  
**Subject:** RE: See Kevin's bullet below

Debra,

## Ex. 5 - Deliberative Process

# Ex. 5 - Deliberative Process

Sorry for the lengthy reply!

Brian

**From:** Dalcher, Debra  
**Sent:** Tuesday, November 21, 2017 1:54 PM  
**To:** Shrager, Brian <[Shrager.Brian@epa.gov](mailto:Shrager.Brian@epa.gov)>  
**Cc:** Dalcher, Debra <[dalcher.debra@epa.gov](mailto:dalcher.debra@epa.gov)>  
**Subject:** See Kevin's bullet below

# **Ex. 5 - Deliberative Process**

Thanks, Debra

Debra S. Dalcher

U.S. EPA

Policy and Strategies Group

Sector Policies and Programs Division, OAQPS

109 T.W. Alexander Drive

Research Triangle Park, NC 27711

Phone: 919-541-2443

**To:** Jordan, Scott[Jordan.Scott@epa.gov]  
**From:** Dalcher, Debra  
**Sent:** Tue 1/9/2018 4:24:23 PM  
**Subject:** RE: OIAI Rulemaking Docket

## Ex. 5 - Attorney Client

**From:** Jordan, Scott  
**Sent:** Tuesday, January 09, 2018 11:22 AM  
**To:** Dalcher, Debra <dalcher.debra@epa.gov>  
**Subject:** Re: OIAI Rulemaking Docket

## Ex. 5 - Attorney Client

Scott Jordan

Air and Radiation Law Office

Office of General Counsel

202-564-7508

---

**From:** Dalcher, Debra  
**Sent:** Tuesday, January 9, 2018 11:12 AM  
**To:** Jordan, Scott

**Subject:** OIAI Rulemaking Docket

Scott,

# **Ex. 5 - Attorney Client**

Thanks, Debra

Debra S. Dalcher

U.S. EPA

Policy and Strategies Group

Sector Policies and Programs Division, OAQPS

109 T.W. Alexander Drive

Research Triangle Park, NC 27711

Phone: 919-541-2443



**To:** Shrager, Brian[Shrager.Brian@epa.gov]; Eck, Janet[Eck.Janet@epa.gov]  
**From:** Dalcher, Debra  
**Sent:** Thur 1/18/2018 11:34:12 PM  
**Subject:** Sample of a FR Notice

## **Ex. 5 - Deliberative Process**

**To:** Jordan, Scott[Jordan.Scott@epa.gov]  
**From:** Dalcher, Debra  
**Sent:** Thur 1/25/2018 6:05:42 PM  
**Subject:** RE: Finally, I am back

## Ex. 5 - Attorney Client

**From:** Jordan, Scott  
**Sent:** Thursday, January 25, 2018 1:05 PM  
**To:** Dalcher, Debra <dalcher.debra@epa.gov>; Rodman, Sonja <Rodman.Sonja@epa.gov>  
**Subject:** Finally, I am back

My 11:00-11:30 meeting was followed by a 11:30-1:00 post-meeting with David Harlow and Justin Schwab, and I am just now back and turning to OIAI.

Scott Jordan

Air and Radiation Law Office

Office of General Counsel

202-564-7508

**To:** Dunkins, Robin[Dunkins.Robin@epa.gov]  
**Cc:** Torres, Elineth[Torres.Elineth@epa.gov]; Lamason, Bill[Lamason.Bill@epa.gov]; Schrock, Bill[Schrock.Bill@epa.gov]; Hanks, Katie[hanks.katie@epa.gov]; Bradfield, John[Bradfield.John@epa.gov]  
**From:** Dalcher, Debra  
**Sent:** Tue 11/21/2017 7:35:42 PM  
**Subject:** RE: Examples OIAI

Thank you Robin, Bill, Katie, and John.

I appreciate all of the work you put into this. I will review and follow-up with questions if needed.

Happy Thanksgiving everyone, Debra

**From:** Dunkins, Robin  
**Sent:** Tuesday, November 21, 2017 2:24 PM  
**To:** Dalcher, Debra <dalcher.debra@epa.gov>  
**Cc:** Torres, Elineth <Torres.Elineth@epa.gov>; Lamason, Bill <Lamason.Bill@epa.gov>; Schrock, Bill <Schrock.Bill@epa.gov>; Hanks, Katie <hanks.katie@epa.gov>; Bradfield, John <Bradfield.John@epa.gov>  
**Subject:** RE: Examples OIAI

## Ex. 5 - Deliberative Process

## **Ex. 5 - Deliberative Process**

## Ex. 5 - Deliberative Process

Robin Dunkins, Group Leader

Natural Resources Group

OAR/OAQPS/SPPD Mail Code: E143-03

U.S. Environmental Protection Agency

Research Triangle Park, NC 27711

919-541-5335

[dunkins.robin@epa.gov](mailto:dunkins.robin@epa.gov)

**From:** Dalcher, Debra

**Sent:** Wednesday, November 15, 2017 1:21 PM

**To:** Dunkins, Robin <[Dunkins.Robin@epa.gov](mailto:Dunkins.Robin@epa.gov)>

**Cc:** Torres, Elineth <[Torres.Elineth@epa.gov](mailto:Torres.Elineth@epa.gov)>; Dalcher, Debra <[dalcher.debra@epa.gov](mailto:dalcher.debra@epa.gov)>;  
Lamason, Bill <[Lamason.Bill@epa.gov](mailto:Lamason.Bill@epa.gov)>

**Subject:** Examples OIAI

**Importance:** High

Robin,

## Ex. 5 - Deliberative Process

# Ex. 5 - Deliberative Process

Thank you much, Debra

**From:** Torres, Elineth  
**Sent:** Wednesday, November 15, 2017 1:17 PM  
**To:** Dalcher, Debra <[dalcher.debra@epa.gov](mailto:dalcher.debra@epa.gov)>  
**Subject:** examples OIAI

# Ex. 5 - Deliberative Process

# **Ex. 5 - Deliberative Process**

Elineth Torres

OAQPS

919-541-4347

**To:** Jordan, Scott[Jordan.Scott@epa.gov]  
**From:** Dalcher, Debra  
**Sent:** Tue 1/9/2018 4:12:48 PM  
**Subject:** OIAI Rulemaking Docket

Scott,

# Ex. 5 - Attorney Client

If you are not the right person to ask, please let me know.

Thanks, Debra

Debra S. Dalcher

U.S. EPA

Policy and Strategies Group

Sector Policies and Programs Division, OAQPS

109 T.W. Alexander Drive

Research Triangle Park, NC 27711

Phone: 919-541-2443



**To:** Rodman, Sonja[Rodman.Sonja@epa.gov]; Jordan, Scott[Jordan.Scott@epa.gov]  
**Cc:** Vetter, Rick[Vetter.Rick@epa.gov]  
**From:** Dalcher, Debra  
**Sent:** Mon 12/4/2017 5:54:09 PM  
**Subject:** RE: OIAI Draft Memo - Two corrections to comments

Thank you Sonja!

**From:** Rodman, Sonja  
**Sent:** Monday, December 04, 2017 12:40 PM  
**To:** Jordan, Scott <Jordan.Scott@epa.gov>; Dalcher, Debra <dalcher.debra@epa.gov>  
**Cc:** Vetter, Rick <Vetter.Rick@epa.gov>  
**Subject:** RE: OIAI Draft Memo - Two corrections to comments

A few suggested edits from me.

Sonja L. Rodman

Air Toxics, Consumer Protection and Indoor Air Practice Group

(202) 564-4079

*CONFIDENTIALITY NOTICE: This message may contain sensitive, privileged information covered by the deliberative process, attorney-client and/or attorney work product privileges. Do not release this message under FOIA without appropriate review. If you are not the intended recipient, or the employee or agent responsible to deliver it to the intended recipient, please contact the sender and delete all copies.*

**From:** Jordan, Scott  
**Sent:** Monday, December 04, 2017 9:28 AM  
**To:** Dalcher, Debra <dalcher.debra@epa.gov>  
**Cc:** Vetter, Rick <Vetter.Rick@epa.gov>; Rodman, Sonja <Rodman.Sonja@epa.gov>  
**Subject:** OIAI Draft Memo - Two corrections to comments

Debra –

# Ex. 5 - Attorney Client

Scott Jordan

Air and Radiation Law Office

Office of General Counsel

202-564-7508

**From:** Dalcher, Debra

**Sent:** Monday, December 04, 2017 8:44 AM

**To:** Lamason, Bill <[Lamason.Bill@epa.gov](mailto:Lamason.Bill@epa.gov)>; French, Chuck <[French.Chuck@epa.gov](mailto:French.Chuck@epa.gov)>; McLamb, Marguerite <[McLamb.Marguerite@epa.gov](mailto:McLamb.Marguerite@epa.gov)>; Culligan, Kevin <[Culligan.Kevin@epa.gov](mailto:Culligan.Kevin@epa.gov)>; Vetter, Rick <[Vetter.Rick@epa.gov](mailto:Vetter.Rick@epa.gov)>; Jordan, Scott <[Jordan.Scott@epa.gov](mailto:Jordan.Scott@epa.gov)>

**Cc:** Dalcher, Debra <[dalcher.debra@epa.gov](mailto:dalcher.debra@epa.gov)>

**Subject:** OIAI\_12.4.17 0800 DD.docx

**Importance:** High

Good Morning Everyone,

# Ex. 5 - Attorney Client

# **Ex. 5 - Attorney Client**

Thank you, Debra

**To:** Lassiter, Penny[Lassiter.Penny@epa.gov]  
**From:** Dalcher, Debra  
**Sent:** Thur 1/18/2018 10:29:19 PM  
**Subject:** Re: Once In Always In - Document for Today's Meeting - Notes on Memo and Rulemaking

Thank you Penny. Debra

---

**From:** Lassiter, Penny  
**Sent:** Thursday, January 18, 2018 5:27:42 PM  
**To:** Jordan, Scott; Lamason, Bill; Culligan, Kevin; Dalcher, Debra; Rodman, Sonja  
**Subject:** RE: Once In Always In - Document for Today's Meeting - Notes on Memo and Rulemaking

# Ex. 5 - Attorney Client

Penny Lassiter

Group Leader

Refining and Chemicals Group

SPPD/OAQPS

U.S. Environmental Protection Agency

Mail Code: E143-01

Research Triangle Park, NC 27711

(919) 541-5396

lassiter.penny@epa.gov

**From:** Jordan, Scott

**Sent:** Thursday, January 18, 2018 11:20 AM

**To:** Harlow, David <harlow.david@epa.gov>; Lamason, Bill <Lamason.Bill@epa.gov>;

Culligan, Kevin <Culligan.Kevin@epa.gov>; Dalcher, Debra <dalcher.debra@epa.gov>;

Rodman, Sonja <Rodman.Sonja@epa.gov>; Lassiter, Penny <Lassiter.Penny@epa.gov>

**Subject:** Once In Always In - Document for Today's Meeting - Notes on Memo and Rulemaking

To All –

# Ex. 5 - Attorney Client

Scott Jordan

Air and Radiation Law Office

Office of General Counsel

202-564-7508

-----Original Appointment-----

**From:** Harlow, David

**Sent:** Friday, January 12, 2018 3:15 PM

**To:** Harlow, David; Lamason, Bill; Culligan, Kevin; Dalcher, Debra; Jordan, Scott; Rodman, Sonja; Lassiter, Penny

**Subject:** General Discussion

**When:** Thursday, January 18, 2018 4:00 PM-4:30 PM (UTC-05:00) Eastern Time (US & Canada).

**Where:** WJC-N 5415 + Dial In: Ex. 6 - Personal Privacy Conference ID: Ex. 6 - Personal Privacy; Participant Code: Ex. 6 - Personal Privacy

Ex. 6 - Personal Privacy

To: David Harlow, Bill Lamason, Kevin Culligan, Debra Dalcher, Scott Jordan, Sonja Rodman

**Cc:** Li, Ryland (Shengzhi)[Li.Ryland@epa.gov]  
**To:** Rodman, Sonja[Rodman.Sonja@epa.gov]; Culligan, Kevin[Culligan.Kevin@epa.gov]; Dalcher, Debra[dalcher.debra@epa.gov]; Shrager, Brian[Shrager.Brian@epa.gov]; Lamason, Bill[Lamason.Bill@epa.gov]; McLamb, Marguerite[McLamb.Marguerite@epa.gov]  
**Sent:** Tue 1/30/2018 7:32:24 PM  
**Subject:** Re: EPA "Once In, Always In" HAP Policy

# Ex. 5 - Attorney Client

Scott Jordan

Air and Radiation Law Office

Office of General Counsel

202-564-7508

---

**From:** Rodman, Sonja  
**Sent:** Tuesday, January 30, 2018 2:30 PM  
**To:** Culligan, Kevin; Dalcher, Debra; Shrager, Brian; Lamason, Bill; McLamb, Marguerite; Jordan, Scott  
**Cc:** Li, Ryland (Shengzhi)  
**Subject:** RE: EPA "Once In, Always In" HAP Policy

# Ex. 5 - Attorney Client

Sonja L. Rodman

Air Toxics, Consumer Protection and Indoor Air Practice Group

(202) 564-4079

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**From:** Culligan, Kevin

**Sent:** Tuesday, January 30, 2018 2:28 PM

**To:** Dalcher, Debra <dalcher.debra@epa.gov>; Shrager, Brian <Shrager.Brian@epa.gov>; Lamason, Bill <Lamason.Bill@epa.gov>; McLamb, Marguerite <McLamb.Marguerite@epa.gov>; Jordan, Scott <Jordan.Scott@epa.gov>

**Cc:** Rodman, Sonja <Rodman.Sonja@epa.gov>

**Subject:** RE: EPA "Once In, Always In" HAP Policy

It seems like there are two questions here:

# Ex. 5 - Attorney Client

## Ex. 5 - Attorney Client



## Ex. 5 - Attorney Client

**From:** Dalcher, Debra  
**Sent:** Tuesday, January 30, 2018 2:13 PM  
**To:** Shrager, Brian <[Shrager.Brian@epa.gov](mailto:Shrager.Brian@epa.gov)>; Lamason, Bill <[Lamason.Bill@epa.gov](mailto:Lamason.Bill@epa.gov)>; Culligan, Kevin <[Culligan.Kevin@epa.gov](mailto:Culligan.Kevin@epa.gov)>; McLamb, Marguerite <[McLamb.Marguerite@epa.gov](mailto:McLamb.Marguerite@epa.gov)>; Jordan, Scott <[Jordan.Scott@epa.gov](mailto:Jordan.Scott@epa.gov)>  
**Cc:** Rodman, Sonja <[Rodman.Sonja@epa.gov](mailto:Rodman.Sonja@epa.gov)>  
**Subject:** FW: EPA "Once In, Always In" HAP Policy  
**Importance:** High

Can anyone help with this one?

**From:** Jared Rothstein [<mailto:rothsteinj@socma.com>]  
**Sent:** Tuesday, January 30, 2018 1:48 PM  
**To:** Torres, Elineth <[Torres.Elineth@epa.gov](mailto:Torres.Elineth@epa.gov)>; Dalcher, Debra <[dalcher.debra@epa.gov](mailto:dalcher.debra@epa.gov)>  
**Subject:** EPA "Once In, Always In" HAP Policy

Hello Debra and Elineth,

I recently reviewed the U.S. EPA [guidance memorandum](#) announcing its withdrawal of its "once in always in" policy for the classification of major sources of hazardous air pollutants under section 112 of the Clean Air Act, and had a couple questions regarding implementation. Do you know which states have the delegated authority to ratify this change in policy? My understanding is that it would only apply to the states that have been delegated by EPA to administer the 112 program. I assume EPA's position is that the states with delegated authority are obliged to follow the new policy if they want to maintain their delegation, because the new memo says clearly that the old policy is not authorized by the statute? Any information you might have regarding state adoption of the policy would be very helpful.

Thank you!

Jared

**Jared A. Rothstein** | *Senior Manager, Regulatory Affairs*

Society of Chemical Manufacturers & Affiliates (SOCMA)

1400 Crystal Drive | Suite 630 | Arlington, VA 22202

(571) 348-5122 | [rothsteinj@socma.com](mailto:rothsteinj@socma.com)

**To:** Jordan, Scott[Jordan.Scott@epa.gov]  
**From:** Srinivasan, Gautam  
**Sent:** Thur 1/25/2018 6:43:45 PM  
**Subject:** RE: OIAI - Heads up re Harlow Call re one Sentence

## Ex. 5 - Attorney Client

+++++

202-564-5647 (o)

202-695-6287 (c)

**From:** Jordan, Scott  
**Sent:** Thursday, January 25, 2018 1:39 PM  
**To:** Schwab, Justin <Schwab.Justin@epa.gov>; Rodman, Sonja <Rodman.Sonja@epa.gov>;  
Srinivasan, Gautam <Srinivasan.Gautam@epa.gov>  
**Subject:** OIAI - Heads up re Harlow Call re one Sentence

Justin –

## Ex. 5 - Attorney Client

Scott Jordan

Air and Radiation Law Office

Office of General Counsel

202-564-7508

**From:** Schwab, Justin

**Sent:** Thursday, January 25, 2018 9:33 AM

**To:** Rodman, Sonja <[Rodman.Sonja@epa.gov](mailto:Rodman.Sonja@epa.gov)>; Srinivasan, Gautam  
<[Srinivasan.Gautam@epa.gov](mailto:Srinivasan.Gautam@epa.gov)>; Jordan, Scott <[Jordan.Scott@epa.gov](mailto:Jordan.Scott@epa.gov)>

**Subject:** RE: NEED INPUT BY TOMORROW MORNING: Once-In-Always-In Guidance  
Memorandum

## Ex. 5 - Attorney Client

**From:** Rodman, Sonja

**Sent:** Thursday, January 25, 2018 9:25 AM

**To:** Schwab, Justin <[Schwab.Justin@epa.gov](mailto:Schwab.Justin@epa.gov)>; Srinivasan, Gautam  
<[Srinivasan.Gautam@epa.gov](mailto:Srinivasan.Gautam@epa.gov)>; Jordan, Scott <[Jordan.Scott@epa.gov](mailto:Jordan.Scott@epa.gov)>

**Subject:** RE: NEED INPUT BY TOMORROW MORNING: Once-In-Always-In Guidance  
Memorandum

Look at Scott's. Mine is just a cleaned up version of that. I moved a few of his comments into e-mail.

Sonja L. Rodman

Air Toxics, Consumer Protection and Indoor Air Practice Group

(202) 564-4079

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**From:** Schwab, Justin  
**Sent:** Thursday, January 25, 2018 9:23 AM  
**To:** Rodman, Sonja <[Rodman.Sonja@epa.gov](mailto:Rodman.Sonja@epa.gov)>; Srinivasan, Gautam <[Srinivasan.Gautam@epa.gov](mailto:Srinivasan.Gautam@epa.gov)>; Jordan, Scott <[Jordan.Scott@epa.gov](mailto:Jordan.Scott@epa.gov)>  
**Subject:** RE: NEED INPUT BY TOMORROW MORNING: Once-In-Always-In Guidance Memorandum

I have 2 drafts sent to me recently, one by Scott at 8:40, one by Sonja at 8:57 (to which this message replies).

Which should I review?

**From:** Rodman, Sonja  
**Sent:** Thursday, January 25, 2018 8:57 AM  
**To:** Schwab, Justin <[Schwab.Justin@epa.gov](mailto:Schwab.Justin@epa.gov)>; Srinivasan, Gautam <[Srinivasan.Gautam@epa.gov](mailto:Srinivasan.Gautam@epa.gov)>; Jordan, Scott <[Jordan.Scott@epa.gov](mailto:Jordan.Scott@epa.gov)>  
**Subject:** FW: NEED INPUT BY TOMORROW MORNING: Once-In-Always-In Guidance Memorandum

Our responses in bold below. Also revised draft attached. I'd like to send this to OAR shortly.

Sonja L. Rodman

Air Toxics, Consumer Protection and Indoor Air Practice Group

(202) 564-4079

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**From:** Schwab, Justin  
**Sent:** Thursday, January 25, 2018 7:49 AM  
**To:** Srinivasan, Gautam <[Srinivasan.Gautam@epa.gov](mailto:Srinivasan.Gautam@epa.gov)>  
**Cc:** Rodman, Sonja <[Rodman.Sonja@epa.gov](mailto:Rodman.Sonja@epa.gov)>; Jordan, Scott <[Jordan.Scott@epa.gov](mailto:Jordan.Scott@epa.gov)>  
**Subject:** Re: NEED INPUT BY TOMORROW MORNING: Once-In-Always-In Guidance Memorandum

## Ex. 5 - Attorney Client

Sent from my iPhone

On Jan 25, 2018, at 7:42 AM, Srinivasan, Gautam <[Srinivasan.Gautam@epa.gov](mailto:Srinivasan.Gautam@epa.gov)> wrote:

## Ex. 5 - Attorney Client

+++++

202-564-5647 (o)

202-695-6287 (c)

On Jan 24, 2018, at 9:53 PM, Schwab, Justin <[Schwab.Justin@epa.gov](mailto:Schwab.Justin@epa.gov)> wrote:

## Ex. 5 - Attorney Client

# **Ex. 5 - Attorney Client**

## **Ex. 5 - Attorney Client**

## **Ex. 5 - Attorney Client**



Sent from my iPhone

On Jan 24, 2018, at 7:24 PM, Rodman, Sonja <[Rodman.Sonja@epa.gov](mailto:Rodman.Sonja@epa.gov)> wrote:

Justin, I just learned that Bill Wehrum wants to sign the OIAI guidance memo tomorrow afternoon. Is there any way you can get any comments to us first thing in the morning? Sorry, I thought we had more time. If you want to discuss anything tonight please call my personal cell [REDACTED] Thanks! – Sonja

Ex. 6 - Personal Privacy

Sonja L. Rodman

Air Toxics, Consumer Protection and Indoor Air Practice Group

(202) 564-4079

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**From:** Rodman, Sonja

**Sent:** Wednesday, January 24, 2018 11:59 AM

**To:** Schwab, Justin <[schwab.justin@epa.gov](mailto:schwab.justin@epa.gov)>

**Cc:** Jordan, Scott <[Jordan.Scott@epa.gov](mailto:Jordan.Scott@epa.gov)>; Srinivasan, Gautam <[Srinivasan.Gautam@epa.gov](mailto:Srinivasan.Gautam@epa.gov)>

**Subject:** FOR YOUR REVIEW: Once-In-Always-In Guidance Memorandum

## Ex. 5 - Attorney Client / Deliberative Process

Sonja L. Rodman

Air Toxics, Consumer Protection and Indoor Air Practice Group

(202) 564-4079

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**To:** Harlow, David[harlow.david@epa.gov]; Lamason, Bill[Lamason.Bill@epa.gov]; Culligan, Kevin[Culligan.Kevin@epa.gov]; Dalcher, Debra[dalcher.debra@epa.gov]; Rodman, Sonja[Rodman.Sonja@epa.gov]; Lassiter, Penny[Lassiter.Penny@epa.gov]  
**Bcc:** Jordan, Scott[Jordan.Scott@epa.gov]  
**From:** Jordan, Scott  
**Sent:** Wed 1/24/2018 4:54:11 PM  
**Subject:** OIAI - January 25 1995 Seitz Memo re Options for Limiting PTE  
Seitz Memo.Options for Limiting PTE under CAA 112 and Title V.Jan 25 1995.pdf

## Ex. 5 - Attorney Client / Deliberative Process

Scott Jordan

Air and Radiation Law Office

Office of General Counsel

202-564-7508

**To:** Prabhu, Aditi[Prabhu.Aditi@epa.gov]  
**Cc:** Rodman, Sonja[Rodman.Sonja@epa.gov]; Simons, Andrew[Simons.Andrew@epa.gov]  
**Bcc:** Jordan, Scott[Jordan.Scott@epa.gov]  
**From:** Jordan, Scott  
**Sent:** Wed 1/10/2018 9:14:08 PM  
**Subject:** RE: Interpretive Rules

## Ex. 5 - Attorney Client

# Ex. 5 - Attorney Client

# Ex. 5 - Attorney Client

Scott Jordan

Air and Radiation Law Office

Office of General Counsel

202-564-7508

**From:** Prabhu, Aditi

**Sent:** Wednesday, January 10, 2018 3:47 PM

**To:** Jordan, Scott <Jordan.Scott@epa.gov>

**Cc:** Rodman, Sonja <Rodman.Sonja@epa.gov>; Simons, Andrew <Simons.Andrew@epa.gov>

**Subject:** RE: Interpretive Rules

Ex. 5 - Attorney Client

## Ex. 5 - Attorney Client

# Ex. 5 - Attorney Client

# Ex. 5 - Attorney Client

Aditi Prabhu  
Office of General Counsel  
U.S. Environmental Protection Agency  
(202)564-2473

**From:** Prabhu, Aditi  
**Sent:** Wednesday, January 10, 2018 3:10 PM  
**To:** Jordan, Scott <[Jordan.Scott@epa.gov](mailto:Jordan.Scott@epa.gov)>  
**Cc:** Rodman, Sonja <[Rodman.Sonja@epa.gov](mailto:Rodman.Sonja@epa.gov)>; Simons, Andrew <[Simons.Andrew@epa.gov](mailto:Simons.Andrew@epa.gov)>  
**Subject:** RE: Interpretive Rules

Ex. 5 - Attorney Client

## Ex. 5 - Attorney Client

Hi Scott – Sorry I haven’t had time to delve into this yet. Tomorrow from 10-11 or 1-2 would work for me.

Aditi Prabhu  
Office of General Counsel  
U.S. Environmental Protection Agency  
(202)564-2473

**From:** Jordan, Scott  
**Sent:** Wednesday, January 10, 2018 3:00 PM  
**To:** Prabhu, Aditi <[Prabhu.Aditi@epa.gov](mailto:Prabhu.Aditi@epa.gov)>  
**Cc:** Rodman, Sonja <[Rodman.Sonja@epa.gov](mailto:Rodman.Sonja@epa.gov)>; Simons, Andrew <[Simons.Andrew@epa.gov](mailto:Simons.Andrew@epa.gov)>  
**Subject:** RE: Interpretive Rules

Ex. 5 - Attorney Client

## Ex. 5 - Attorney Client

Aditi –

I just found out that OAR is setting up a call next Wednesday to discuss our options, so it would be good if we could talk tomorrow about my questions.

Do you have any time available tomorrow? I am currently available any time between 9 and 4, except I have a meeting from 2-3.

Sorry for the short turnaround on this.

Scott Jordan

Air and Radiation Law Office

Office of General Counsel

202-564-7508

**From:** Jordan, Scott  
**Sent:** Wednesday, January 10, 2018 7:13 AM  
**To:** Talty, Mark <Talty.Mark@epa.gov>  
**Cc:** Rodman, Sonja <Rodman.Sonja@epa.gov>; Simons, Andrew <Simons.Andrew@epa.gov>; Prabhu, Aditi <Prabhu.Aditi@epa.gov>  
**Subject:** RE: Interpretive Rules

Ex. 5 - Attorney Client

**Ex. 5 - Attorney Client**

Mark – Thanks for passing this on.

**Ex. 5 - Attorney Client**

Scott Jordan

Air and Radiation Law Office

Office of General Counsel

202-564-7508

**From:** Talty, Mark  
**Sent:** Tuesday, January 09, 2018 10:29 AM  
**To:** Jordan, Scott <Jordan.Scott@epa.gov>  
**Cc:** Rodman, Sonja <Rodman.Sonja@epa.gov>; Simons, Andrew <Simons.Andrew@epa.gov>; Prabhu, Aditi <Prabhu.Aditi@epa.gov>  
**Subject:** RE: Interpretive Rules - Final Agency Action? Subject to Judicial Review?

**Ex. 5 - Attorney Client**



Best regards,

Mark

Mark C. Talty

Cross-Cutting Issues Law Office

Office of General Counsel

U.S. Environmental Protection Agency

(202) 564-1262

[talty.mark@epa.gov](mailto:talty.mark@epa.gov)

**From:** Jordan, Scott

**Sent:** Tuesday, January 09, 2018 10:10 AM

**To:** Talty, Mark <[Talty.Mark@epa.gov](mailto:Talty.Mark@epa.gov)>

**Cc:** Rodman, Sonja <[Rodman.Sonja@epa.gov](mailto:Rodman.Sonja@epa.gov)>; Simons, Andrew <[Simons.Andrew@epa.gov](mailto:Simons.Andrew@epa.gov)>

**Subject:** Interpretive Rules -

**Ex. 5 - Attorney Client**

Mark -

**Ex. 5 - Attorney Client**

# Ex. 5 - Attorney Client

If you want to discuss any aspect of this today, I am working from home at

Ex. 6 - Personal Privacy

Ex. 6 - Personal Privacy

Thanks,

Scott Jordan

Air and Radiation Law Office

Office of General Counsel

202-564-7508

**To:** Prabhu, Aditi[Prabhu.Aditi@epa.gov]; Simons, Andrew[Simons.Andrew@epa.gov]  
**Cc:** Rodman, Sonja[Rodman.Sonja@epa.gov]  
**Bcc:** Jordan, Scott[Jordan.Scott@epa.gov]  
**From:** Jordan, Scott  
**Sent:** Thur 1/18/2018 12:24:51 PM  
**Subject:** Once In Always In - Follow up Question

Aditi and Andy –

# Ex. 5 - Attorney Client

Thanks,

Scott Jordan

Air and Radiation Law Office

Office of General Counsel

202-564-7508

**To:** Dalcher, Debra[dalcher.debra@epa.gov]; Vetter, Rick[Vetter.Rick@epa.gov]; Rodman, Sonja[Rodman.Sonja@epa.gov]; McLamb, Marguerite[McLamb.Marguerite@epa.gov]; Lamason, Bill[Lamason.Bill@epa.gov]; French, Chuck[French.Chuck@epa.gov]  
**Cc:** Shrager, Brian[Shrager.Brian@epa.gov]  
**From:** Jordan, Scott  
**Sent:** Fri 12/8/2017 2:50:32 PM  
**Subject:** OIAI Revision Memo - Scott Comments  
OIAI Revision Memo 12.7.17 DD BLS 1200+SJJ12.8.17.docx

...

I have marked some suggested edits and comment on the OIAI revision memo. See attached.

## Ex. 5 - Attorney Client

Scott Jordan

Air and Radiation Law Office

Office of General Counsel

202-564-7508

---

**From:** Dalcher, Debra  
**Sent:** Thursday, December 7, 2017 11:48 AM  
**To:** Jordan, Scott; Vetter, Rick; Rodman, Sonja; McLamb, Marguerite; Lamason, Bill; French, Chuck  
**Cc:** Dalcher, Debra; Shrager, Brian  
**Subject:** OIAI Options Pager & OIAI Revision Memo  
Good Morning Everyone,

Attached you will find the current version of the Revision Memo incorporating Scott Jordan's most recent edits/comments/suggestions. After working to accommodate his most recent review Brian Shrager also reviewed (thank you Brian!). I hopefully have addressed his comments and have left his review comments in for informational purposes given I did make changes to OGC reviewed material. Please review those sections carefully and advise if those changes are not acceptable.

Attached is the also the Options Pager we will be using to brief B. Wehrum next week (probably 12/13 but nothing definitive yet). Please review the Options pager and provide

edits as appropriate. The content under the second bullet was changed since everyone last reviewed this document in coordination with K. Culligan. I would like to finalize the Options Pager by COB tomorrow if possible given they will be asking for it on Monday if we meet with Bill on Wednesday (I think). Please look for any inconsistencies between the two documents if possible.

Hopefully we are getting close on the draft memo and can also finalize that draft by Monday COB to allow me time to work on the response to comment like document we reference in the memo 😊.

Thank you everyone! Debra

**Cc:** Lamason, Bill[Lamason.Bill@epa.gov]; Rodman, Sonja[Rodman.Sonja@epa.gov]  
**Bcc:** Jordan, Scott[Jordan.Scott@epa.gov]  
**To:** Dalcher, Debra[dalcher.debra@epa.gov]  
**From:** Jordan, Scott  
**Sent:** Fri 1/19/2018 1:34:05 PM  
**Subject:** OIAI - Revised Memo post Harlow Meeting - Scott's Comments  
OIAI Revised OIAI memorandum.SJJ+DD.1.18.18+SJJ 1.19.18.docx

# Ex. 5 - Attorney Client

Scott Jordan

Air and Radiation Law Office

Office of General Counsel

202-564-7508

---

**From:** Dalcher, Debra  
**Sent:** Thursday, January 18, 2018 7:04 PM  
**To:** Jordan, Scott  
**Cc:** Dalcher, Debra; Lamason, Bill  
**Subject:** Revised Memo post Marlow Meeting

Scott, please review the attached.

**Ex. 5 - Attorney Client**

**Ex. 5 - Attorney Client**



**Cc:** Li, Ryland (Shengzhi)[Li.Ryland@epa.gov]  
**Bcc:** Jordan, Scott[Jordan.Scott@epa.gov]  
**To:** Rodman, Sonja[Rodman.Sonja@epa.gov]; Culligan, Kevin[Culligan.Kevin@epa.gov]; Dalcher, Debra[dalcher.debra@epa.gov]; Shrager, Brian[Shrager.Brian@epa.gov]; Lamason, Bill[Lamason.Bill@epa.gov]; McLamb, Marguerite[McLamb.Marguerite@epa.gov]  
**From:** Jordan, Scott  
**Sent:** Tue 1/30/2018 7:57:57 PM  
**Subject:** MM2A - SOCMA Question re State Delegation and Implementation of Plain Language reading

# Ex. 5 - Attorney Client

Scott Jordan

Air and Radiation Law Office

Office of General Counsel

202-564-7508

---

**From:** Rodman, Sonja

**Sent:** Tuesday, January 30, 2018 2:30 PM

**To:** Culligan, Kevin; Dalcher, Debra; Shrager, Brian; Lamason, Bill; McLamb, Marguerite; Jordan, Scott

**Cc:** Li, Ryland (Shengzhi)

**Subject:** RE: EPA "Once In, Always In" HAP Policy

## Ex. 5 - Attorney Client

Sonja L. Rodman

Air Toxics, Consumer Protection and Indoor Air Practice Group

(202) 564-4079

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**From:** Culligan, Kevin

**Sent:** Tuesday, January 30, 2018 2:28 PM

**To:** Dalcher, Debra <dalcher.debra@epa.gov>; Shrager, Brian <Shrager.Brian@epa.gov>; Lamason, Bill <Lamason.Bill@epa.gov>; McLamb, Marguerite <McLamb.Marguerite@epa.gov>; Jordan, Scott <Jordan.Scott@epa.gov>

**Cc:** Rodman, Sonja <Rodman.Sonja@epa.gov>

**Subject:** RE: EPA "Once In, Always In" HAP Policy

## Ex. 5 - Attorney Client

# Ex. 5 - Attorney Client

**From:** Dalcher, Debra  
**Sent:** Tuesday, January 30, 2018 2:13 PM  
**To:** Shrager, Brian <[Shrager.Brian@epa.gov](mailto:Shrager.Brian@epa.gov)>; Lamason, Bill <[Lamason.Bill@epa.gov](mailto:Lamason.Bill@epa.gov)>; Culligan, Kevin <[Culligan.Kevin@epa.gov](mailto:Culligan.Kevin@epa.gov)>; McLamb, Marguerite <[McLamb.Marguerite@epa.gov](mailto:McLamb.Marguerite@epa.gov)>; Jordan, Scott <[Jordan.Scott@epa.gov](mailto:Jordan.Scott@epa.gov)>  
**Cc:** Rodman, Sonja <[Rodman.Sonja@epa.gov](mailto:Rodman.Sonja@epa.gov)>  
**Subject:** FW: EPA "Once In, Always In" HAP Policy  
**Importance:** High

Can anyone help with this one?

**From:** Jared Rothstein [<mailto:rothsteinj@socma.com>]  
**Sent:** Tuesday, January 30, 2018 1:48 PM  
**To:** Torres, Elineth <[Torres.Elineth@epa.gov](mailto:Torres.Elineth@epa.gov)>; Dalcher, Debra <[dalcher.debra@epa.gov](mailto:dalcher.debra@epa.gov)>  
**Subject:** EPA "Once In, Always In" HAP Policy

Hello Debra and Elineth,

I recently reviewed the U.S. EPA [guidance memorandum](#) announcing its withdrawal of its "once in always in" policy for the classification of major sources of hazardous air pollutants under section 112 of the Clean Air Act, and had a couple questions regarding implementation. Do you know which states have the delegated authority to ratify this change in policy? My understanding is that it would only apply to the states that have been delegated by EPA to administer the 112 program. I assume EPA's position is that the states with delegated authority are obliged to follow the new policy if they want to maintain their delegation, because the new memo says clearly that the old policy is not authorized by the statute? Any information you might have regarding state adoption of the policy would be very helpful.

Thank you!

Jared

**Jared A. Rothstein** | *Senior Manager, Regulatory Affairs*

Society of Chemical Manufacturers & Affiliates (SOCMA)

1400 Crystal Drive | Suite 630 | Arlington, VA 22202

(571) 348-5122 | [rothsteinj@socma.com](mailto:rothsteinj@socma.com)

**Cc:** Versace, Paul[Versace.Paul@epa.gov]  
**Bcc:** Jordan, Scott[Jordan.Scott@epa.gov]  
**To:** McLamb, Marguerite[McLamb.Marguerite@epa.gov]; Vetter, Rick[Vetter.Rick@epa.gov]; Rodman, Sonja[Rodman.Sonja@epa.gov]  
**From:** Jordan, Scott  
**Sent:** Thur 11/30/2017 5:02:08 PM  
**Subject:** Re: first cut at revising OIAI memo - Scott's comments

Marguerite - Thanks.

Scott Jordan

Air and Radiation Law Office

Office of General Counsel

202-564-7508

---

**From:** McLamb, Marguerite  
**Sent:** Thursday, November 30, 2017 11:57 AM  
**To:** Jordan, Scott; Vetter, Rick; Rodman, Sonja  
**Cc:** Versace, Paul  
**Subject:** RE: first cut at revising OIAI memo - Scott's comments

Scott,

## Ex. 5 - Attorney Client

Best,

Marguerite

**From:** Jordan, Scott  
**Sent:** Thursday, November 30, 2017 11:19 AM  
**To:** Vetter, Rick <Vetter.Rick@epa.gov>; Rodman, Sonja <Rodman.Sonja@epa.gov>  
**Cc:** Versace, Paul <Versace.Paul@epa.gov>; McLamb, Marguerite <McLamb.Marguerite@epa.gov>  
**Subject:** Re: first cut at revising OIAI memo - Scott's comments

Thanks.

# Ex. 5 - Attorney Client

Scott Jordan

Air and Radiation Law Office

Office of General Counsel

202-564-7508

---

**From:** Vetter, Rick

**Sent:** Thursday, November 30, 2017 10:58 AM

**To:** Jordan, Scott; Rodman, Sonja

**Cc:** Versace, Paul; McLamb, Marguerite

**Subject:** RE: first cut at revising OIAI memo - Scott's comments

# **Ex. 5 - Attorney Client**

Rick

**Richard H. Vetter**

Richard H. Vetter

Attorney Advisor

Air & Radiation Law Office

Office of General Counsel

[vetter.rick@epa.gov](mailto:vetter.rick@epa.gov)

919-541-2127

**From:** Jordan, Scott

**Sent:** Thursday, November 30, 2017 8:43 AM

**To:** Rodman, Sonja <[Rodman.Sonja@epa.gov](mailto:Rodman.Sonja@epa.gov)>; Vetter, Rick <[Vetter.Rick@epa.gov](mailto:Vetter.Rick@epa.gov)>

**Cc:** Versace, Paul <[Versace.Paul@epa.gov](mailto:Versace.Paul@epa.gov)>; McLamb, Marguerite  
<[McLamb.Marguerite@epa.gov](mailto:McLamb.Marguerite@epa.gov)>

**Subject:** Re: first cut at revising OIAI memo - Scott's comments

# Ex. 5 - Attorney Client



# Ex. 5 - Attorney Client

Scott Jordan

Air and Radiation Law Office

Office of General Counsel

202-564-7508

---

**From:** Rodman, Sonja

**Sent:** Tuesday, November 28, 2017 5:16 PM

**To:** Vetter, Rick; Jordan, Scott

**Cc:** Versace, Paul

**Subject:** FW: first cut at revising OIAI memo

# Ex. 5 - Attorney Client

Sonja L. Rodman

Air Toxics, Consumer Protection and Indoor Air Practice Group

(202) 564-4079

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**Cc:** Versace, Paul[Versace.Paul@epa.gov]; McLamb, Marguerite[McLamb.Marguerite@epa.gov]  
**Bcc:** Jordan, Scott[Jordan.Scott@epa.gov]  
**To:** Vetter, Rick[Vetter.Rick@epa.gov]; Rodman, Sonja[Rodman.Sonja@epa.gov]  
**From:** Jordan, Scott  
**Sent:** Thur 11/30/2017 4:18:54 PM  
**Subject:** Re: first cut at revising OIAI memo - Scott's comments

Thanks.

# Ex. 5 - Attorney Client

Scott Jordan

Air and Radiation Law Office

Office of General Counsel

202-564-7508

---

**From:** Vetter, Rick  
**Sent:** Thursday, November 30, 2017 10:58 AM  
**To:** Jordan, Scott; Rodman, Sonja  
**Cc:** Versace, Paul; McLamb, Marguerite  
**Subject:** RE: first cut at revising OIAI memo - Scott's comments

# Ex. 5 - Attorney Client

Rick

Richard H. Vetter

Richard H. Vetter

Attorney Advisor

Air & Radiation Law Office

Office of General Counsel

[vetter.rick@epa.gov](mailto:vetter.rick@epa.gov)

919-541-2127

**From:** Jordan, Scott

**Sent:** Thursday, November 30, 2017 8:43 AM

**To:** Rodman, Sonja <Rodman.Sonja@epa.gov>; Vetter, Rick <Vetter.Rick@epa.gov>

**Cc:** Versace, Paul <Versace.Paul@epa.gov>; McLamb, Marguerite  
<McLamb.Marguerite@epa.gov>

**Subject:** Re: first cut at revising OIAI memo - Scott's comments

# Ex. 5 - Attorney Client

# Ex. 5 - Attorney Client

Scott Jordan

Air and Radiation Law Office

Office of General Counsel

202-564-7508

---

**From:** Rodman, Sonja  
**Sent:** Tuesday, November 28, 2017 5:16 PM  
**To:** Vetter, Rick; Jordan, Scott  
**Cc:** Versace, Paul  
**Subject:** FW: first cut at revising OIAI memo

# Ex. 5 - Attorney Client

Sonja L. Rodman  
Air Toxics, Consumer Protection and Indoor Air Practice Group  
(202) 564-4079

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-----Original Message-----

From: McLamb, Marguerite  
Sent: Tuesday, November 28, 2017 10:14 AM  
To: Rodman, Sonja <[Rodman.Sonja@epa.gov](mailto:Rodman.Sonja@epa.gov)>  
Subject: first cut at revising OIAI memo

# Ex. 5 - Attorney Client

\*\*\*\*\*

Marguerite E. McLamb  
Policy Advisor  
Sector Policies and Programs Division  
Office of Air Quality Planning & Standards  
U.S. Environmental Protection Agency  
Research Triangle Park, NC 27711  
Phone: (919) 541-7858  
Fax: (919) 541-4991  
[mclamb.marguerite@epa.gov](mailto:mclamb.marguerite@epa.gov)

**To:** Rodman, Sonja[Rodman.Sonja@epa.gov]  
**Bcc:** Jordan, Scott[Jordan.Scott@epa.gov]  
**From:** Jordan, Scott  
**Sent:** Thur 1/11/2018 11:49:00 AM  
**Subject:** RE: Interpretive Rules -

## Ex. 5 - Attorney Client

Also, do you think it would be worthwhile for the two of us to meet at 10:00, and/or do you want to be on the call with OAQPS at 12:30?

Scott Jordan

Air and Radiation Law Office

Office of General Counsel

202-564-7508

**From:** Rodman, Sonja  
**Sent:** Wednesday, January 10, 2018 5:26 PM  
**To:** Jordan, Scott <Jordan.Scott@epa.gov>  
**Cc:** Prabhu, Aditi <Prabhu.Aditi@epa.gov>; Simons, Andrew <Simons.Andrew@epa.gov>  
**Subject:** Re: Interpretive Rules

Ex. 5 - Attorney Client

## Ex. 5 - Attorney Client

# Ex. 5 - Attorney Client

Sent from my iPhone

On Jan 10, 2018, at 4:14 PM, Jordan, Scott <[Jordan.Scott@epa.gov](mailto:Jordan.Scott@epa.gov)> wrote:

# Ex. 5 - Attorney Client

# **Ex. 5 - Attorney Client**

Scott Jordan

Air and Radiation Law Office

Office of General Counsel



202-564-7508

**From:** Prabhu, Aditi

**Sent:** Wednesday, January 10, 2018 3:47 PM

**To:** Jordan, Scott <[Jordan.Scott@epa.gov](mailto:Jordan.Scott@epa.gov)>

**Cc:** Rodman, Sonja <[Rodman.Sonja@epa.gov](mailto:Rodman.Sonja@epa.gov)>; Simons, Andrew  
<[Simons.Andrew@epa.gov](mailto:Simons.Andrew@epa.gov)>

**Subject:** RE: Interpretive Rules

Ex. 5 - Attorney Client

**Ex. 5 - Attorney Client**

**Ex. 5 - Attorney Client**

# Ex. 5 - Attorney Client

Aditi Prabhu  
Office of General Counsel  
U.S. Environmental Protection Agency  
(202)564-2473

**From:** Prabhu, Aditi  
**Sent:** Wednesday, January 10, 2018 3:10 PM  
**To:** Jordan, Scott <[Jordan.Scott@epa.gov](mailto:Jordan.Scott@epa.gov)>  
**Cc:** Rodman, Sonja <[Rodman.Sonja@epa.gov](mailto:Rodman.Sonja@epa.gov)>; Simons, Andrew  
<[Simons.Andrew@epa.gov](mailto:Simons.Andrew@epa.gov)>  
**Subject:** RE: Interpretive Rules

Ex. 5 - Attorney Client

## Ex. 5 - Attorney Client

Hi Scott – Sorry I haven't had time to delve into this yet. Tomorrow from 10-11 or 1-2 would work for me.

Aditi Prabhu  
Office of General Counsel  
U.S. Environmental Protection Agency  
(202)564-2473

**From:** Jordan, Scott  
**Sent:** Wednesday, January 10, 2018 3:00 PM  
**To:** Prabhu, Aditi <[Prabhu.Aditi@epa.gov](mailto:Prabhu.Aditi@epa.gov)>  
**Cc:** Rodman, Sonja <[Rodman.Sonja@epa.gov](mailto:Rodman.Sonja@epa.gov)>; Simons, Andrew  
<[Simons.Andrew@epa.gov](mailto:Simons.Andrew@epa.gov)>  
**Subject:** RE: Interpretive Rules

## Ex. 5 - Attorney Client

Ex. 5 - Attorney Client

Aditi –

I just found out that OAR is setting up a call next Wednesday to discuss our options, so it would be good if we could talk tomorrow about my questions.

Do you have any time available tomorrow? I am currently available any time between 9 and 4, except I have a meeting from 2-3.

Sorry for the short turnaround on this.

Scott Jordan

Air and Radiation Law Office

Office of General Counsel

202-564-7508

**From:** Jordan, Scott  
**Sent:** Wednesday, January 10, 2018 7:13 AM  
**To:** Talty, Mark <[Talty.Mark@epa.gov](mailto:Talty.Mark@epa.gov)>  
**Cc:** Rodman, Sonja <[Rodman.Sonja@epa.gov](mailto:Rodman.Sonja@epa.gov)>; Simons, Andrew  
<[Simons.Andrew@epa.gov](mailto:Simons.Andrew@epa.gov)>; Prabhu, Aditi <[Prabhu.Aditi@epa.gov](mailto:Prabhu.Aditi@epa.gov)>  
**Subject:** RE: Interpretive Rules - Final Agency Action? Subject to Judicial Review? (re OIAI Policy)

Mark – Thanks for passing this on.

# Ex. 5 - Attorney Client

Scott Jordan

Air and Radiation Law Office

Office of General Counsel

202-564-7508

**From:** Talty, Mark

**Sent:** Tuesday, January 09, 2018 10:29 AM

**To:** Jordan, Scott <[Jordan.Scott@epa.gov](mailto:Jordan.Scott@epa.gov)>

**Cc:** Rodman, Sonja <[Rodman.Sonja@epa.gov](mailto:Rodman.Sonja@epa.gov)>; Simons, Andrew  
<[Simons.Andrew@epa.gov](mailto:Simons.Andrew@epa.gov)>; Prabhu, Aditi <[Prabhu.Aditi@epa.gov](mailto:Prabhu.Aditi@epa.gov)>

**Subject:** RE: Interpretive Rules

**Ex. 5 - Attorney Client**

# Ex. 5 - Attorney Client

Best regards,

Mark

Mark C. Talty

Cross-Cutting Issues Law Office

Office of General Counsel

U.S. Environmental Protection Agency

(202) 564-1262

[talty.mark@epa.gov](mailto:talty.mark@epa.gov)

**From:** Jordan, Scott

**Sent:** Tuesday, January 09, 2018 10:10 AM

**To:** Talty, Mark <[Talty.Mark@epa.gov](mailto:Talty.Mark@epa.gov)>

**Cc:** Rodman, Sonja <[Rodman.Sonja@epa.gov](mailto:Rodman.Sonja@epa.gov)>; Simons, Andrew  
<[Simons.Andrew@epa.gov](mailto:Simons.Andrew@epa.gov)>

**Subject:** Interpretive Rules -

**Ex. 5 - Attorney Client**

Mark -

**Ex. 5 - Attorney Client**

# Ex. 5 - Attorney Client

If you want to discuss any aspect of this today, I am working from home at

Ex. 6 - Personal Privacy

Ex. 6 - Personal Privacy

Thanks,

Scott Jordan

Air and Radiation Law Office

Office of General Counsel

202-564-7508

**Bcc:** Jordan, Scott[Jordan.Scott@epa.gov]  
**To:** Dalcher, Debra[dalcher.debra@epa.gov]  
**From:** Jordan, Scott  
**Sent:** Fri 1/19/2018 8:06:47 PM  
**Subject:** Fw: just a couple minor comments  
[OIAI.Revised OIAI memorandum.SJJ+DD.1.18.18+SJJ + DD 1.19.18 SLR.docx](#)

## Ex. 5 - Attorney Client

Scott Jordan

Air and Radiation Law Office

Office of General Counsel

202-564-7508

---

**From:** Rodman, Sonja  
**Sent:** Friday, January 19, 2018 1:42 PM  
**To:** Jordan, Scott  
**Subject:** just a couple minor comments

## Ex. 5 - Attorney Client

Sonja L. Rodman

Air Toxics, Consumer Protection and Indoor Air Practice Group

(202) 564-4079

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**To:** Jordan, Scott[Jordan.Scott@epa.gov]  
**From:** Jordan, Scott  
**Sent:** Fri 1/19/2018 2:03:59 PM  
**Subject:** Once In Always In

See emails below

## Ex. 5 - Attorney Client

Scott Jordan

Air and Radiation Law Office

Office of General Counsel

202-564-7508

---

**From:** Prabhu, Aditi  
**Sent:** Thursday, January 18, 2018 2:21 PM  
**To:** Rodman, Sonja; Jordan, Scott  
**Cc:** Simons, Andrew  
**Subject:** RE: Once In Always In - Follow up Question

## Ex. 5 - Attorney Client

# Ex. 5 - Attorney Client

Aditi Prabhu  
Office of General Counsel  
U.S. Environmental Protection Agency  
(202)564-2473

**From:** Rodman, Sonja  
**Sent:** Thursday, January 18, 2018 11:29 AM  
**To:** Jordan, Scott <Jordan.Scott@epa.gov>  
**Cc:** Prabhu, Aditi <Prabhu.Aditi@epa.gov>; Simons, Andrew  
<Simons.Andrew@epa.gov>  
**Subject:** Re: Once In Always In - Follow up Question

# Ex. 5 - Attorney Client

Sent from my iPhone

On Jan 18, 2018, at 11:19 AM, Rodman, Sonja <[Rodman.Sonja@epa.gov](mailto:Rodman.Sonja@epa.gov)> wrote:

## **Ex. 5 - Attorney Client**

Sent from my iPhone

On Jan 18, 2018, at 7:24 AM, Jordan, Scott <[Jordan.Scott@epa.gov](mailto:Jordan.Scott@epa.gov)> wrote:

Aditi and Andy –

## **Ex. 5 - Attorney Client**

Thanks,

Scott Jordan

Air and Radiation Law Office

Office of General Counsel

202-564-7508

**To:** Jordan, Scott[Jordan.Scott@epa.gov]; Rodman, Sonja[Rodman.Sonja@epa.gov]  
**From:** Lamason, Bill  
**Sent:** Thur 1/25/2018 1:11:10 PM

**Ex. 5 - Attorney Client**

Thanks! B

**From:** Jordan, Scott  
**Sent:** Thursday, January 25, 2018 7:05 AM  
**To:** Rodman, Sonja <Rodman.Sonja@epa.gov>  
**Cc:** Lamason, Bill <Lamason.Bill@epa.gov>

**Ex. 5 - Attorney Client**

Sonja and Bill –

**Ex. 5 - Attorney Client**

Scott Jordan

Air and Radiation Law Office

Office of General Counsel

202-564-7508

-----Original Message-----

From: Rodman, Sonja

Sent: Wednesday, January 24, 2018 9:00 PM

To: Jordan, Scott <[Jordan.Scott@epa.gov](mailto:Jordan.Scott@epa.gov)>

Subject: FW: Another question

## Ex. 5 - Attorney Client

Sonja L. Rodman

Air Toxics, Consumer Protection and Indoor Air Practice Group

(202) 564-4079

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-----Original Message-----

From: Lamason, Bill

Sent: Wednesday, January 24, 2018 8:54 PM

To: Rodman, Sonja <[Rodman.Sonja@epa.gov](mailto:Rodman.Sonja@epa.gov)>

Subject: Another question

Sonja, FYI.

# Ex. 5 - Attorney Client

from my iPhone

**To:** McLamb, Marguerite[McLamb.Marguerite@epa.gov]; Torres, Elineth[Torres.Elineth@epa.gov]  
**Cc:** Dalcher, Debra[dalcher.debra@epa.gov]  
**From:** Lamason, Bill  
**Sent:** Tue 11/7/2017 9:13:11 PM  
**Subject:** RE: OIAI: memo replacing policy interpretation

Thanks Marguerite! Bill

**From:** McLamb, Marguerite  
**Sent:** Tuesday, November 07, 2017 3:27 PM  
**To:** Torres, Elineth <Torres.Elineth@epa.gov>  
**Cc:** Dalcher, Debra <dalcher.debra@epa.gov>; Lamason, Bill <Lamason.Bill@epa.gov>  
**Subject:** RE: OIAI: memo replacing policy interpretation

Hi, all,

## Ex. 5 - Attorney Client

Best,

Marguerite

**From:** Torres, Elineth  
**Sent:** Tuesday, November 07, 2017 12:17 PM  
**To:** McLamb, Marguerite <McLamb.Marguerite@epa.gov>  
**Cc:** Dalcher, Debra <dalcher.debra@epa.gov>; Lamason, Bill <Lamason.Bill@epa.gov>  
**Subject:** OIAI: memo replacing policy interpretation

Marguerite,

## Ex. 5 - Attorney Client



I am in the office until 3:30pm today, then out until Monday. Debra is the alternate POC on this action. Bill wants to share a version of this memo with Peter tomorrow with the caveat that we still need OGC's input. Let me or Debra know if you have comments/edits on this version.

Finally, I told Bill that you are going to be talking with Sonja about this version of the memo and next steps regarding OGC involvement.

Thank you!

Elineth Torres

OAQPS

919-541-4347

**To:** Dalcher, Debra[dalcher.debra@epa.gov]  
**From:** Lamason, Bill  
**Sent:** Tue 11/21/2017 2:10:09 PM  
**Subject:** Re: Memo replacing OIAI with proposed 2007 interpretation\_11\_20\_17\_3pm.docx

Good to know. Thanks! B

Sent from my iPhone

> On Nov 21, 2017, at 7:44 AM, Dalcher, Debra <dalcher.debra@epa.gov> wrote:

>

> Not sure I am part of that call. Marguerite might have the call with Sonja. Don't worry about calling in. I will be there and drag Chuck along if he is available.

>

> Thank you, Debra

>

> -----Original Message-----

> From: Lamason, Bill

> Sent: Monday, November 20, 2017 6:18 PM

> To: Dalcher, Debra <dalcher.debra@epa.gov>

> Subject: FW: Memo replacing OIAI with proposed 2007 interpretation\_11\_20\_17\_3pm.docx

>

> Meant to send this to you! B

>

> Nice note again! 2 for 2! Thanks. I may be able to call in to the discussion in the morning if that would help. Will watch for invite. B

>

> -----Original Message-----

> From: McLamb, Marguerite

> Sent: Monday, November 20, 2017 6:08 PM

> To: Rodman, Sonja <Rodman.Sonja@epa.gov>; Dalcher, Debra <dalcher.debra@epa.gov>

> Cc: Vetter, Rick <Vetter.Rick@epa.gov>; Lamason, Bill <Lamason.Bill@epa.gov>; Culligan, Kevin <Culligan.Kevin@epa.gov>; French, Chuck <French.Chuck@epa.gov>

> Subject: RE: Memo replacing OIAI with proposed 2007 interpretation\_11\_20\_17\_3pm.docx

>

> Great. Sonja, I will set up a time to talk in the morning. Thanks, everyone.

>

> \*\*\*\*\*

> Marguerite E. McLamb

> Policy Advisor

> Sector Policies and Programs Division

> Office of Air Quality Planning & Standards U.S. Environmental Protection Agency Research Triangle Park, NC 27711

> Phone: (919) 541-7858

> Fax: (919) 541-4991

> mclamb.marguerite@epa.gov

>

>

> From: Rodman, Sonja

> Sent: Monday, November 20, 2017 5:54 PM

> To: Dalcher, Debra; McLamb, Marguerite

> Cc: Vetter, Rick; Lamason, Bill; Culligan, Kevin; French, Chuck

> Subject: RE: Memo replacing OIAI with proposed 2007 interpretation\_11\_20\_17\_3pm.docx

>

> Thanks everyone, Marguerite give me a call if you'd like to discuss. I have some ideas . . .

>

> Sonja L. Rodman  
> Air Toxics, Consumer Protection and Indoor Air Practice Group  
> (202) 564-4079  
>  
> CONFIDENTIALITY NOTICE: This message may contain sensitive, privileged information covered by the deliberative process, attorney-client and/or attorney work product privileges. Do not release this message under FOIA without appropriate review. If you are not the intended recipient, or the employee or agent responsible to deliver it to the intended recipient, please contact the sender and delete all copies.  
>  
> From: Dalcher, Debra  
> Sent: Monday, November 20, 2017 3:22 PM  
> To: McLamb, Marguerite <McLamb.Marguerite@epa.gov>  
> Cc: Vetter, Rick <Vetter.Rick@epa.gov>; Lamason, Bill <Lamason.Bill@epa.gov>; Dalcher, Debra <dalcher.debra@epa.gov>; Culligan, Kevin <Culligan.Kevin@epa.gov>; Rodman, Sonja <Rodman.Sonja@epa.gov>; French, Chuck <French.Chuck@epa.gov>  
> Subject: Memo replacing OIAI with proposed 2007 interpretation\_11\_20\_17\_3pm.docx  
> Importance: High  
>  
> Marguerite,

## Ex. 5 - Attorney Client

>  
> Rick sent a note that he will be out of the office after noon tomorrow (returning on 11/28) so if we could get something to him for review that would be helpful. He did say that he is working on the legal section so hopefully he will share that prior to his departure and we can plug that in to inform further work on the memo.  
>  
> Sonja would like to review after Rick per her email, but maybe we can get some feedback on the revised organization of the memo sooner rather than later.  
>  
> I have not received the list we discussed from Kevin yet. I will be in the office Tuesday and Wednesday of this week working on the memo and starting review/work on the 2007 proposal comments.  
>  
> Thank you everyone, Debra

**To:** Lamason, Bill[Lamason.Bill@epa.gov]  
**Cc:** Dalcher, Debra[dalcher.debra@epa.gov]  
**From:** McLamb.Marguerite@epa.gov  
**Sent:** Thur 11/30/2017 3:24:05 PM  
**Subject:** Re: OIAI Memo

Debra, let's talk after the 10:30 staff meeting at

On Nov 30, 2017, at 10:21 AM, Lamason, Bill <[Lamason.Bill@epa.gov](mailto:Lamason.Bill@epa.gov)> wrote:

Can you and Debra talk? I'm tied up until Noon with meetings/tasks. Thanks!  
Bill

**From:** McLamb, Marguerite  
**Sent:** Thursday, November 30, 2017 10:18 AM  
**To:** Lamason, Bill <[Lamason.Bill@epa.gov](mailto:Lamason.Bill@epa.gov)>  
**Cc:** Dalcher, Debra <[dalcher.debra@epa.gov](mailto:dalcher.debra@epa.gov)>  
**Subject:** Re: OIAI Memo

Hi, Bill,

I have heard from OGC this morning and have comments from Scott Jordan. I will share those shortly. We can talk about this if you'd like this morning.

Best, Marguerite

On Nov 29, 2017, at 3:31 PM, Lamason, Bill <[Lamason.Bill@epa.gov](mailto:Lamason.Bill@epa.gov)> wrote:

Marguerite,

Thanks for the update. Can we see the current version? It would help me prepare some talking points for Peter. On timing, let's chat in the morning when you are in before Kevin calls me. I'll wait to set the meeting with Peter until Kevin and I touch base. Thanks again!

Bill

**From:** McLamb, Marguerite  
**Sent:** Wednesday, November 29, 2017 3:28 PM  
**To:** Lamason, Bill <[Lamason.Bill@epa.gov](mailto:Lamason.Bill@epa.gov)>  
**Cc:** Dalcher, Debra <[dalcher.debra@epa.gov](mailto:dalcher.debra@epa.gov)>  
**Subject:** Re: OIAI Memo

Hi, Bill,

OGC has the memo from me and is reviewing and adding to it. I talked to Sonja yesterday, and she is having Rick and Scott work on it while she is out, and she'll weigh in on it early next week. She knows our timeframe. We can talk in the morning if you'd like.

Best,

Marguerite

On Nov 29, 2017, at 2:49 PM, Lamason, Bill <[Lamason.Bill@epa.gov](mailto:Lamason.Bill@epa.gov)> wrote:

Marguerite,

Hope you are well. I left you a voicemail on your desk phone. Just checking on where we are on your (and OGC's) review of the OIAI memo. I need to schedule time with Peter for next week to prep for a discussion with the AA and would like to update Peter on the latest version of the memo and potential timing/direction for moving forward. Let me know when you have a moment. Thanks!

Bill

**To:** McLamb, Marguerite[McLamb.Marguerite@epa.gov]; Vetter, Rick[Vetter.Rick@epa.gov]; Rodman, Sonja[Rodman.Sonja@epa.gov]  
**Cc:** Versace, Paul[Versace.Paul@epa.gov]  
**From:** Jordan, Scott  
**Sent:** Thur 11/30/2017 5:02:07 PM  
**Subject:** Re: first cut at revising OIAI memo - Scott's comments

Marguerite - Thanks.

Scott Jordan

Air and Radiation Law Office

Office of General Counsel

202-564-7508

---

**From:** McLamb, Marguerite  
**Sent:** Thursday, November 30, 2017 11:57 AM  
**To:** Jordan, Scott; Vetter, Rick; Rodman, Sonja  
**Cc:** Versace, Paul  
**Subject:** RE: first cut at revising OIAI memo - Scott's comments

Scott,

## Ex. 5 - Attorney Client

Best,

Marguerite

**From:** Jordan, Scott  
**Sent:** Thursday, November 30, 2017 11:19 AM  
**To:** Vetter, Rick <Vetter.Rick@epa.gov>; Rodman, Sonja <Rodman.Sonja@epa.gov>  
**Cc:** Versace, Paul <Versace.Paul@epa.gov>; McLamb, Marguerite <McLamb.Marguerite@epa.gov>  
**Subject:** Re: first cut at revising OIAI memo - Scott's comments

Thanks.

# Ex. 5 - Attorney Client

Scott Jordan

Air and Radiation Law Office

Office of General Counsel

202-564-7508

---

**From:** Vetter, Rick

**Sent:** Thursday, November 30, 2017 10:58 AM

**To:** Jordan, Scott; Rodman, Sonja

**Cc:** Versace, Paul; McLamb, Marguerite

**Subject:** RE: first cut at revising OIAI memo - Scott's comments

# **Ex. 5 - Attorney Client**

Rick

Richard H. Vetter

Richard H. Vetter

Attorney Advisor

Air & Radiation Law Office

Office of General Counsel

[vetter.rick@epa.gov](mailto:vetter.rick@epa.gov)



919-541-2127

**From:** Jordan, Scott

**Sent:** Thursday, November 30, 2017 8:43 AM

**To:** Rodman, Sonja <[Rodman.Sonja@epa.gov](mailto:Rodman.Sonja@epa.gov)>; Vetter, Rick <[Vetter.Rick@epa.gov](mailto:Vetter.Rick@epa.gov)>

**Cc:** Versace, Paul <[Versace.Paul@epa.gov](mailto:Versace.Paul@epa.gov)>; McLamb, Marguerite  
<[McLamb.Marguerite@epa.gov](mailto:McLamb.Marguerite@epa.gov)>

**Subject:** Re: first cut at revising OIAI memo - Scott's comments

## Ex. 5 - Attorney Client

# Ex. 5 - Attorney Client

Scott Jordan

Air and Radiation Law Office

Office of General Counsel

202-564-7508

---

**From:** Rodman, Sonja  
**Sent:** Tuesday, November 28, 2017 5:16 PM  
**To:** Vetter, Rick; Jordan, Scott  
**Cc:** Versace, Paul  
**Subject:** FW: first cut at revising OIAI memo

# Ex. 5 - Attorney Client

Sonja L. Rodman  
Air Toxics, Consumer Protection and Indoor Air Practice Group  
(202) 564-4079

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**To:** Jordan, Scott[Jordan.Scott@epa.gov]; Rodman, Sonja[Rodman.Sonja@epa.gov]  
**Cc:** Versace, Paul[Versace.Paul@epa.gov]; McLamb, Marguerite[McLamb.Marguerite@epa.gov]  
**From:** Vetter, Rick  
**Sent:** Thur 11/30/2017 4:58:44 PM  
**Subject:** RE: first cut at revising OIAI memo - Scott's comments

## Ex. 5 - Attorney Client

Richard H. Vetter

Richard H. Vetter

Attorney Advisor

Air & Radiation Law Office

Office of General Counsel

[vetter.rick@epa.gov](mailto:vetter.rick@epa.gov)

919-541-2127

**From:** Jordan, Scott  
**Sent:** Thursday, November 30, 2017 11:19 AM  
**To:** Vetter, Rick <Vetter.Rick@epa.gov>; Rodman, Sonja <Rodman.Sonja@epa.gov>  
**Cc:** Versace, Paul <Versace.Paul@epa.gov>; McLamb, Marguerite <McLamb.Marguerite@epa.gov>  
**Subject:** Re: first cut at revising OIAI memo - Scott's comments

Thanks.

Ex. 5 - Attorney Client

# Ex. 5 - Attorney Client

Scott Jordan

Air and Radiation Law Office

Office of General Counsel

202-564-7508

---

**From:** Vetter, Rick

**Sent:** Thursday, November 30, 2017 10:58 AM

**To:** Jordan, Scott; Rodman, Sonja

**Cc:** Versace, Paul; McLamb, Marguerite

**Subject:** RE: first cut at revising OIAI memo - Scott's comments

# Ex. 5 - Attorney Client

# Ex. 5 - Attorney Client

Rick

Richard H. Vetter

Richard H. Vetter

Attorney Advisor

Air & Radiation Law Office

Office of General Counsel

[vetter.rick@epa.gov](mailto:vetter.rick@epa.gov)

919-541-2127

**From:** Jordan, Scott

**Sent:** Thursday, November 30, 2017 8:43 AM

**To:** Rodman, Sonja <[Rodman.Sonja@epa.gov](mailto:Rodman.Sonja@epa.gov)>; Vetter, Rick <[Vetter.Rick@epa.gov](mailto:Vetter.Rick@epa.gov)>

**Cc:** Versace, Paul <[Versace.Paul@epa.gov](mailto:Versace.Paul@epa.gov)>; McLamb, Marguerite  
<[McLamb.Marguerite@epa.gov](mailto:McLamb.Marguerite@epa.gov)>

**Subject:** Re: first cut at revising OIAI memo - Scott's comments

# Ex. 5 - Attorney Client

Scott Jordan

Air and Radiation Law Office

Office of General Counsel

202-564-7508

---

**From:** Rodman, Sonja  
**Sent:** Tuesday, November 28, 2017 5:16 PM  
**To:** Vetter, Rick; Jordan, Scott  
**Cc:** Versace, Paul  
**Subject:** FW: first cut at revising OIAI memo

## Ex. 5 - Attorney Client

Sonja L. Rodman  
Air Toxics, Consumer Protection and Indoor Air Practice Group  
(202) 564-4079

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-----Original Message-----

From: McLamb, Marguerite  
Sent: Tuesday, November 28, 2017 10:14 AM  
To: Rodman, Sonja <[Rodman.Sonja@epa.gov](mailto:Rodman.Sonja@epa.gov)>  
Subject: first cut at revising OIAI memo

## Ex. 5 - Attorney Client

# Ex. 5 - Attorney Client

Best,  
Marguerite

\*\*\*\*\*

Marguerite E. McLamb  
Policy Advisor  
Sector Policies and Programs Division  
Office of Air Quality Planning & Standards  
U.S. Environmental Protection Agency  
Research Triangle Park, NC 27711  
Phone: (919) 541-7858  
Fax: (919) 541-4991  
[mclamb.marguerite@epa.gov](mailto:mclamb.marguerite@epa.gov)



**To:** Torres, Elineth[Torres.Elineth@epa.gov]; Rodman, Sonja[Rodman.Sonja@epa.gov]  
**Cc:** McLamb, Marguerite[McLamb.Marguerite@epa.gov]  
**From:** Vetter, Rick  
**Sent:** Wed 9/13/2017 12:35:09 PM  
**Subject:** RE: OIAI

Elineth,

## Ex. 5 - Attorney Client

Rick

Richard H. Vetter

Richard H. Vetter

Attorney Advisor

Air & Radiation Law Office

Office of General Counsel

[vetter.rick@epa.gov](mailto:vetter.rick@epa.gov)

919-541-2127

**From:** Torres, Elineth  
**Sent:** Wednesday, September 13, 2017 8:17 AM  
**To:** Vetter, Rick <Vetter.Rick@epa.gov>; Rodman, Sonja <Rodman.Sonja@epa.gov>  
**Cc:** McLamb, Marguerite <McLamb.Marguerite@epa.gov>  
**Subject:** RE: OIAI

Sonja,

I will move forward to address your comments/edits on the OIAI memo. I did not receive anything from Rick.

Thanks,

Elineth Torres

OAQPS

919-541-4347

**From:** Vetter, Rick

**Sent:** Thursday, September 07, 2017 2:52 PM

**To:** Rodman, Sonja <[Rodman.Sonja@epa.gov](mailto:Rodman.Sonja@epa.gov)>

**Cc:** Torres, Elineth <[Torres.Elineth@epa.gov](mailto:Torres.Elineth@epa.gov)>; McLamb, Marguerite <[McLamb.Marguerite@epa.gov](mailto:McLamb.Marguerite@epa.gov)>

**Subject:** RE: OIAI

Will do. It may be morning before I can get back to them though.

Richard H. Vetter

Richard H. Vetter

Attorney Advisor

Air & Radiation Law Office

Office of General Counsel

[vetter.rick@epa.gov](mailto:vetter.rick@epa.gov)

919-541-2127

**From:** Rodman, Sonja

**Sent:** Thursday, September 07, 2017 1:50 PM

**To:** Vetter, Rick <[Vetter.Rick@epa.gov](mailto:Vetter.Rick@epa.gov)>

**Cc:** Torres, Elineth <[Torres.Elineth@epa.gov](mailto:Torres.Elineth@epa.gov)>; McLamb, Marguerite  
<[McLamb.Marguerite@epa.gov](mailto:McLamb.Marguerite@epa.gov)>

**Subject:** OIAI

Rick, Here are my comments on the OIAI memo. Could you add yours on top of mine and send on to Elineth?

Cc'ing Elineth and Marguerite so they can see my comments.

Sonja L. Rodman, Assistant General Counsel for Air Toxics, Consumer Protection and Indoor Air / Office of General Counsel / U.S. Environmental Protection Agency / (202) 564-4079 / 202-768-2120 (cell)

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**To:** Rodman, Sonja[Rodman.Sonja@epa.gov]  
**From:** McLamb, Marguerite  
**Sent:** Wed 11/8/2017 8:39:48 PM  
**Subject:** FW: Memo replacing OIAI with proposed 2007 interpretation\_11\_6\_17 MM (002).docx  
Memo replacing OIAI with proposed 2007 interpretation\_11\_8\_17 DD.docx

Hi, Sonja,

# Ex. 5 - Attorney Client

## Ex. 6 - Personal Privacy

\*\*\*\*\*

Marguerite E. McLamb  
Policy Advisor  
Sector Policies and Programs Division  
Office of Air Quality Planning & Standards  
U.S. Environmental Protection Agency  
Research Triangle Park, NC 27711  
Phone: (919) 541-7858  
Fax: (919) 541-4991  
mclamb.marguerite@epa.gov

**To:** Rodman, Sonja[Rodman.Sonja@epa.gov]  
**From:** McLamb, Marguerite  
**Sent:** Tue 11/7/2017 3:30:27 PM  
**Subject:** FW: OIAI Check-in

Hi –

I just spoke with Elineth about this situation. There is a definite need – and transition opportunity – for a new OGC POC to assist on the topic. Do you have a few minutes today to discuss?

Thanks,

Marguerite

**From:** Torres, Elineth  
**Sent:** Tuesday, November 07, 2017 8:26 AM  
**To:** Rodman, Sonja <Rodman.Sonja@epa.gov>  
**Cc:** Vetter, Rick <Vetter.Rick@epa.gov>; Lamason, Bill <Lamason.Bill@epa.gov>; Dalcher, Debra <dalcher.debra@epa.gov>; McLamb, Marguerite <McLamb.Marguerite@epa.gov>  
**Subject:** RE: OIAI Check-in

## Ex. 5 - Attorney Client

Elineth Torres

OAQPS

919-541-4347

**From:** Rodman, Sonja  
**Sent:** Monday, November 06, 2017 3:12 PM  
**To:** Torres, Elineth <Torres.Elineth@epa.gov>  
**Cc:** Vetter, Rick <Vetter.Rick@epa.gov>; Lamason, Bill <Lamason.Bill@epa.gov>; Dalcher, Debra <dalcher.debra@epa.gov>

**Subject:** RE: OIAI Check-in

Thanks Elineth. I'm trying to dig out from last week. Can you let me know where you all are on this? Thanks! – Sonja

Sonja L. Rodman

Air Toxics, Consumer Protection and Indoor Air Practice Group

(202) 564-4079

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**From:** Torres, Elineth

**Sent:** Wednesday, November 01, 2017 8:30 AM

**To:** Rodman, Sonja <[Rodman.Sonja@epa.gov](mailto:Rodman.Sonja@epa.gov)>

**Cc:** Vetter, Rick <[Vetter.Rick@epa.gov](mailto:Vetter.Rick@epa.gov)>; Lamason, Bill <[Lamason.Bill@epa.gov](mailto:Lamason.Bill@epa.gov)>; Dalcher, Debra <[dalcher.debra@epa.gov](mailto:dalcher.debra@epa.gov)>

**Subject:** RE: OIAI Check-in

Sonja,

## Ex. 6 - Personal Privacy

We will have our meeting at 10AM and move forward with the input we get from Rick. We will circle back with you once you are in the office.

Thanks,

Elineth Torres

OAQPS

919-541-4347

**From:** Torres, Elineth

**Sent:** Wednesday, November 01, 2017 7:54 AM

**To:** Rodman, Sonja <[Rodman.Sonja@epa.gov](mailto:Rodman.Sonja@epa.gov)>

**Cc:** Vetter, Rick <[Vetter.Rick@epa.gov](mailto:Vetter.Rick@epa.gov)>; Lamason, Bill <[Lamason.Bill@epa.gov](mailto:Lamason.Bill@epa.gov)>; Dalcher, Debra <[dalcher.debra@epa.gov](mailto:dalcher.debra@epa.gov)>

**Subject:** RE: OIAI Check-in

Sonja,

Please let us know by email if you have any comments/edits on the options pager or feedback from your management.

Thanks,

Elineth Torres

OAQPS

919-541-4347

-----Original Appointment-----

**From:** Rodman, Sonja

**Sent:** Wednesday, November 01, 2017 7:08 AM

**To:** Torres, Elineth

**Subject:** Declined: OIAI Check-in

**When:** Wednesday, November 01, 2017 10:00 AM-10:30 AM (UTC-05:00) Eastern Time (US & Canada).

**Where:** Bill's Office



**To:** Dalcher, Debra[dalcher.debra@epa.gov]; Lamason, Bill[Lamason.Bill@epa.gov]; Kevin Culligan[Culligan.Kevin@epa.gov]  
**From:** McLamb, Marguerite  
**Sent:** Mon 1/8/2018 4:02:12 PM  
**Subject:** FW: OIAO - Revised Draft Memo following Wehrum Guidance/Revisions - Scott Comments  
[OIAI.RevisedOIAImemorandum\\_1\\_5\\_2018+ SJJ 1.8.18.docx](#)

Hi-

My calendar is not showing an 11 am call, so I may not have been on the invite. Could you please forward the call-in information to me?

Thanks!  
Marguerite

**From:** Jordan, Scott  
**Sent:** Monday, January 08, 2018 10:23 AM  
**To:** Dalcher, Debra <dalcher.debra@epa.gov>; Culligan, Kevin <Culligan.Kevin@epa.gov>; Lamason, Bill <Lamason.Bill@epa.gov>  
**Cc:** Rodman, Sonja <Rodman.Sonja@epa.gov>; McLamb, Marguerite <McLamb.Marguerite@epa.gov>  
**Subject:** OIAO - Revised Draft Memo following Wehrum Guidance/Revisions - Scott Comments

Debra, Kevin and Bill –

# Ex. 5 - Attorney Client

Scott Jordan

Air and Radiation Law Office

Office of General Counsel

202-564-7508

**To:** Rodman, Sonja[Rodman.Sonja@epa.gov]  
**From:** McLamb, Marguerite  
**Sent:** Tue 11/21/2017 6:40:56 PM  
**Subject:** FW: Brief thoughts on Once in Always In

FYI

**From:** Culligan, Kevin  
**Sent:** Tuesday, November 21, 2017 1:20 PM  
**To:** McLamb, Marguerite <McLamb.Marguerite@epa.gov>; Lamason, Bill  
<Lamason.Bill@epa.gov>; Dalcher, Debra <dalcher.debra@epa.gov>  
**Subject:** Brief thoughts on Once in Always In

## Ex. 5 - Attorney-Client/Deliberative Process

## **Ex. 5 - Attorney-Client/Deliberative Process**

## **Ex. 5 - Attorney-Client/Deliberative Process**

**To:** Rodman, Sonja[Rodman.Sonja@epa.gov]  
**From:** Wilcox, Geoffrey  
**Sent:** Fri 1/26/2018 7:05:25 PM  
**Subject:** RE: Regular Flexiplace today / OIAI memo

## Ex. 5 - Attorney Client

**From:** Rodman, Sonja  
**Sent:** Friday, January 26, 2018 2:04 PM  
**To:** Wilcox, Geoffrey <wilcox.geoffrey@epa.gov>  
**Subject:** FW: Regular Flexiplace today / OIAI memo

## Ex. 5 - Attorney Client

Sonja L. Rodman

Air Toxics, Consumer Protection and Indoor Air Practice Group

(202) 564-4079

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**From:** Thrift, Mike  
**Sent:** Friday, January 26, 2018 1:50 PM  
**To:** Rodman, Sonja <[Rodman.Sonja@epa.gov](mailto:Rodman.Sonja@epa.gov)>; OGC ARLO Air Toxics <[OGC\\_ARLO\\_Air\\_Toxics@epa.gov](mailto:OGC_ARLO_Air_Toxics@epa.gov)>; OGC ARLO MGMT <[OGC\\_ARLO\\_MGMT@epa.gov](mailto:OGC_ARLO_MGMT@epa.gov)>  
**Subject:** RE: Regular Flexiplace today / OIAI memo

# Ex. 5 - Attorney Client

**From:** Rodman, Sonja  
**Sent:** Friday, January 26, 2018 5:20 AM  
**To:** OGC ARLO Air Toxics <[OGC\\_ARLO\\_Air\\_Toxics@epa.gov](mailto:OGC_ARLO_Air_Toxics@epa.gov)>; OGC ARLO MGMT  
<[OGC\\_ARLO\\_MGMT@epa.gov](mailto:OGC_ARLO_MGMT@epa.gov)>  
**Subject:** Regular Flexiplace today / OIAI memo

# Ex. 6 - Personal Privacy

## Ex. 6 - Personal Privacy

Finally, FYI, I'm attaching the memo Bill Wehrum signed yesterday afternoon withdrawing the Once-In-Always-In policy.

Happy Friday!!

Sonja L. Rodman

Air Toxics, Consumer Protection and Indoor Air Practice Group

(202) 564-4079

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**To:** Simons, Andrew[Simons.Andrew@epa.gov]; Prabhu, Aditi[Prabhu.Aditi@epa.gov]; Jordan, Scott[Jordan.Scott@epa.gov]  
**Sent:** Thur 1/11/2018 2:17:38 PM  
**Subject:** RE:

## Ex. 5 - Attorney Client

Sonja L. Rodman

Air Toxics, Consumer Protection and Indoor Air Practice Group

(202) 564-4079

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**From:** Simons, Andrew  
**Sent:** Thursday, January 11, 2018 9:15 AM  
**To:** Prabhu, Aditi <Prabhu.Aditi@epa.gov>; Jordan, Scott <Jordan.Scott@epa.gov>  
**Cc:** Rodman, Sonja <Rodman.Sonja@epa.gov>  
**Subject:** RE:

## Ex. 5 - Attorney Client

Ex. 5 - Attorney Client

# Ex. 5 - Attorney Client

Andrew Simons

Assistant General Counsel  
Regulatory Issues Practice Group  
Office of General Counsel  
U.S. Environmental Protection Agency  
Tel. 202-564-3649

WJC-N 7522C

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Please consider the environment before printing this email.

**From:** Prabhu, Aditi  
**Sent:** Thursday, January 11, 2018 9:10 AM  
**To:** Jordan, Scott <[Jordan.Scott@epa.gov](mailto:Jordan.Scott@epa.gov)>  
**Cc:** Rodman, Sonja <[Rodman.Sonja@epa.gov](mailto:Rodman.Sonja@epa.gov)>; Simons, Andrew <[Simons.Andrew@epa.gov](mailto:Simons.Andrew@epa.gov)>  
**Subject:** Re:

Ex. 5 - Attorney Client

**Ex. 5 - Attorney Client**

**Ex. 5 - Attorney Client**

12-

**Ex. 6 - Personal Privacy**

Can we postpone this meeting to Monday? I'm compressed tomorrow.

Sent from my iPhone

On Jan 11, 2018, at 6:48 AM, Jordan, Scott <[Jordan.Scott@epa.gov](mailto:Jordan.Scott@epa.gov)> wrote:

Sonja –

**Ex. 5 - Attorney Client**

# Ex. 5 - Attorney Client

Scott Jordan

Air and Radiation Law Office

Office of General Counsel

202-564-7508

**From:** Rodman, Sonja

**Sent:** Wednesday, January 10, 2018 5:26 PM

**To:** Jordan, Scott <[Jordan.Scott@epa.gov](mailto:Jordan.Scott@epa.gov)>

**Cc:** Prabhu, Aditi <[Prabhu.Aditi@epa.gov](mailto:Prabhu.Aditi@epa.gov)>; Simons, Andrew <[Simons.Andrew@epa.gov](mailto:Simons.Andrew@epa.gov)>

**Subject:** Re:

Ex. 5 - Attorney Client

## Ex. 5 - Attorney Client

# Ex. 5 - Attorney Client

Sent from my iPhone

On Jan 10, 2018, at 4:14 PM, Jordan, Scott <[Jordan.Scott@epa.gov](mailto:Jordan.Scott@epa.gov)> wrote:

## Ex. 5 - Attorney Client

# **Ex. 5 - Attorney Client**

Scott Jordan

Air and Radiation Law Office

Office of General Counsel

202-564-7508

**From:** Prabhu, Aditi

**Sent:** Wednesday, January 10, 2018 3:47 PM

**To:** Jordan, Scott <[Jordan.Scott@epa.gov](mailto:Jordan.Scott@epa.gov)>

**Cc:** Rodman, Sonja <[Rodman.Sonja@epa.gov](mailto:Rodman.Sonja@epa.gov)>; Simons, Andrew  
<[Simons.Andrew@epa.gov](mailto:Simons.Andrew@epa.gov)>

**Subject:** RE:

**Ex. 5 - Attorney Client**

Ex. 5 - Attorney Client

**Ex. 5 - Attorney Client**

## Ex. 5 - Deliberative Process

We can discuss tomorrow.

Aditi Prabhu  
Office of General Counsel  
U.S. Environmental Protection Agency  
(202)564-2473

**From:** Prabhu, Aditi  
**Sent:** Wednesday, January 10, 2018 3:10 PM  
**To:** Jordan, Scott <[Jordan.Scott@epa.gov](mailto:Jordan.Scott@epa.gov)>  
**Cc:** Rodman, Sonja <[Rodman.Sonja@epa.gov](mailto:Rodman.Sonja@epa.gov)>; Simons, Andrew <[Simons.Andrew@epa.gov](mailto:Simons.Andrew@epa.gov)>  
**Subject:** RE:

Ex. 5 - Attorney Client

## Ex. 5 - Attorney Client

Hi Scott – Sorry I haven't had time to delve into this yet. Tomorrow from 10-11 or 1-2 would work for me.

Aditi Prabhu  
Office of General Counsel  
U.S. Environmental Protection Agency  
(202)564-2473

**From:** Jordan, Scott  
**Sent:** Wednesday, January 10, 2018 3:00 PM

**To:** Prabhu, Aditi <[Prabhu.Aditi@epa.gov](mailto:Prabhu.Aditi@epa.gov)>  
**Cc:** Rodman, Sonja <[Rodman.Sonja@epa.gov](mailto:Rodman.Sonja@epa.gov)>; Simons, Andrew  
<[Simons.Andrew@epa.gov](mailto:Simons.Andrew@epa.gov)>

**Subject:** RE:

Ex. 5 - Attorney Client

## Ex. 5 - Attorney Client

Aditi –

I just found out that OAR is setting up a call next Wednesday to discuss our options, so it would be good if we could talk tomorrow about my questions.

Do you have any time available tomorrow? I am currently available any time between 9 and 4, except I have a meeting from 2-3.

Sorry for the short turnaround on this.

Scott Jordan

Air and Radiation Law Office

Office of General Counsel

202-564-7508

**From:** Jordan, Scott

**Sent:** Wednesday, January 10, 2018 7:13 AM

**To:** Talty, Mark <[Talty.Mark@epa.gov](mailto:Talty.Mark@epa.gov)>

**Cc:** Rodman, Sonja <[Rodman.Sonja@epa.gov](mailto:Rodman.Sonja@epa.gov)>; Simons, Andrew  
<[Simons.Andrew@epa.gov](mailto:Simons.Andrew@epa.gov)>; Prabhu, Aditi <[Prabhu.Aditi@epa.gov](mailto:Prabhu.Aditi@epa.gov)>

**Subject:** RE:

Ex. 5 - Attorney Client

## Ex. 5 - Attorney Client

Mark – Thanks for passing this on.

# Ex. 5 - Attorney Client

Scott Jordan

Air and Radiation Law Office

Office of General Counsel

202-564-7508

**From:** Talty, Mark

**Sent:** Tuesday, January 09, 2018 10:29 AM

**To:** Jordan, Scott <[Jordan.Scott@epa.gov](mailto:Jordan.Scott@epa.gov)>

**Cc:** Rodman, Sonja <[Rodman.Sonja@epa.gov](mailto:Rodman.Sonja@epa.gov)>; Simons, Andrew

<[Simons.Andrew@epa.gov](mailto:Simons.Andrew@epa.gov)>; Prabhu, Aditi <[Prabhu.Aditi@epa.gov](mailto:Prabhu.Aditi@epa.gov)>

**Subject:** RE: **Ex. 5 - Attorney Client** Special Review?

# Ex. 5 - Attorney Client

Best regards,

Mark



Mark C. Talty

Cross-Cutting Issues Law Office

Office of General Counsel

U.S. Environmental Protection Agency

(202) 564-1262

[talty.mark@epa.gov](mailto:talty.mark@epa.gov)

**From:** Jordan, Scott

**Sent:** Tuesday, January 09, 2018 10:10 AM

**To:** Talty, Mark <[Talty.Mark@epa.gov](mailto:Talty.Mark@epa.gov)>

**Cc:** Rodman, Sonja <[Rodman.Sonja@epa.gov](mailto:Rodman.Sonja@epa.gov)>; Simons, Andrew  
<[Simons.Andrew@epa.gov](mailto:Simons.Andrew@epa.gov)>

**Subject:**

**Ex. 5 - Attorney Client**

Mark -

**Ex. 5 - Attorney Client**

# Ex. 5 - Attorney Client

If you want to discuss any aspect of this today, I am working from home at

Ex. 6 - Personal Privacy

Ex. 6 - Personal Privacy

Thanks,

Scott Jordan

Air and Radiation Law Office

Office of General Counsel

202-564-7508

**To:** Rodman, Sonja[Rodman.Sonja@epa.gov]; Greenglass, Nora[Greenglass.Nora@epa.gov]  
**From:** Jordan, Scott  
**Sent:** Wed 1/31/2018 3:53:40 PM  
**Subject:** Adding Info re Wehrum MM2A Memo to Air Toxics Library

Sonja and Nora –

# Ex. 5 - Attorney Client

Let me know if you want to discuss this.

Thanks

Scott Jordan

Air and Radiation Law Office

Office of General Counsel

202-564-7508

**To:** Rodman, Sonja[Rodman.Sonja@epa.gov]  
**From:** Srinivasan, Gautam  
**Sent:** Thur 1/25/2018 1:45:56 AM  
**Subject:** Re: NEED INPUT BY TOMORROW MORNING: Once-In-Always-In Guidance Memorandum

Thanks.

## Ex. 5 - Deliberative Process

++++  
202-564-5647 (o)  
202-695-6287 (c)

On Jan 24, 2018, at 8:07 PM, Rodman, Sonja <Rodman.Sonja@epa.gov> wrote:

# Ex. 5 - Attorney Client

Sonja L. Rodman

Air Toxics, Consumer Protection and Indoor Air Practice Group

(202) 564-4079

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**From:** Srinivasan, Gautam  
**Sent:** Wednesday, January 24, 2018 8:03 PM  
**To:** Rodman, Sonja <Rodman.Sonja@epa.gov>  
**Subject:** Re: NEED INPUT BY TOMORROW MORNING: Once-In-Always-In Guidance Memorandum

# Ex. 5 - Attorney Client

## Ex. 5 - Attorney Client

+++++

202-564-5647 (o)

202-695-6287 (c)

On Jan 24, 2018, at 7:58 PM, Rodman, Sonja <[Rodman.Sonja@epa.gov](mailto:Rodman.Sonja@epa.gov)> wrote:

## Ex. 5 - Attorney Client

Sonja L. Rodman

Air Toxics, Consumer Protection and Indoor Air Practice Group

(202) 564-4079

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**From:** Srinivasan, Gautam

**Sent:** Wednesday, January 24, 2018 7:56 PM

**To:** Rodman, Sonja <[Rodman.Sonja@epa.gov](mailto:Rodman.Sonja@epa.gov)>

**Subject:** Re: NEED INPUT BY TOMORROW MORNING: Once-In-Always-In Guidance Memorandum

## Ex. 5 - Attorney Client

+++++

202-564-5647 (o)

202-695-6287 (c)

On Jan 24, 2018, at 7:24 PM, Rodman, Sonja <[Rodman.Sonja@epa.gov](mailto:Rodman.Sonja@epa.gov)> wrote:

## Ex. 5 - Attorney Client

Sonja L. Rodman

Air Toxics, Consumer Protection and Indoor Air Practice Group

(202) 564-4079

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**From:** Rodman, Sonja

**Sent:** Wednesday, January 24, 2018 11:59 AM

**To:** Schwab, Justin <[schwab.justin@epa.gov](mailto:schwab.justin@epa.gov)>

**Cc:** Jordan, Scott <[Jordan.Scott@epa.gov](mailto:Jordan.Scott@epa.gov)>; Srinivasan, Gautam <[Srinivasan.Gautam@epa.gov](mailto:Srinivasan.Gautam@epa.gov)>

**Subject:** FOR YOUR REVIEW: Once-In-Always-In Guidance Memorandum

## Ex. 5 - Attorney Client

# Ex. 5 - Attorney Client

Sonja L. Rodman

Air Toxics, Consumer Protection and Indoor Air Practice Group

(202) 564-4079

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**To:** Tsirigotis, Peter[Tsirigotis.Peter@epa.gov]  
**From:** Lamason, Bill  
**Sent:** Thur 11/16/2017 10:08:42 PM  
**Subject:** FW: Current Version of Revision Memo  
Memo replacing OIAI with proposed 2007 interpretation 11 16 17 430.docx

Peter, FYI. Bill

**From:** Lamason, Bill  
**Sent:** Thursday, November 16, 2017 5:08 PM  
**To:** Culligan, Kevin <Culligan.Kevin@epa.gov>  
**Cc:** French, Chuck <French.Chuck@epa.gov>  
**Subject:** FW: Current Version of Revision Memo

Kevin,

## Ex. 5 - Deliberative Process

Let me know if you have any questions.

Bill

**From:** Dalcher, Debra  
**Sent:** Thursday, November 16, 2017 4:47 PM  
**To:** Rodman, Sonja <[Rodman.Sonja@epa.gov](mailto:Rodman.Sonja@epa.gov)>; Lamason, Bill <[Lamason.Bill@epa.gov](mailto:Lamason.Bill@epa.gov)>  
**Cc:** Torres, Elineth <[Torres.Elineth@epa.gov](mailto:Torres.Elineth@epa.gov)>; Vetter, Rick <[Vetter.Rick@epa.gov](mailto:Vetter.Rick@epa.gov)>; McLamb, Marguerite <[McLamb.Marguerite@epa.gov](mailto:McLamb.Marguerite@epa.gov)>  
**Subject:** RE: Current Version of Revision Memo

# Ex. 5 - Attorney Client

Thank you! Debra

**From:** Rodman, Sonja  
**Sent:** Thursday, November 16, 2017 2:38 PM  
**To:** Dalcher, Debra <[dalcher.debra@epa.gov](mailto:dalcher.debra@epa.gov)>; Vetter, Rick <[Vetter.Rick@epa.gov](mailto:Vetter.Rick@epa.gov)>; McLamb, Marguerite <[McLamb.Marguerite@epa.gov](mailto:McLamb.Marguerite@epa.gov)>  
**Cc:** Torres, Elineth <[Torres.Elineth@epa.gov](mailto:Torres.Elineth@epa.gov)>; Lamason, Bill <[Lamason.Bill@epa.gov](mailto:Lamason.Bill@epa.gov)>  
**Subject:** RE: Current Version of Revision Memo

# Ex. 5 - Attorney Client

Sonja L. Rodman

Air Toxics, Consumer Protection and Indoor Air Practice Group

(202) 564-4079

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**From:** Dalcher, Debra

**Sent:** Thursday, November 16, 2017 2:27 PM

**To:** Vetter, Rick <[Vetter.Rick@epa.gov](mailto:Vetter.Rick@epa.gov)>; McLamb, Marguerite  
<[McLamb.Marguerite@epa.gov](mailto:McLamb.Marguerite@epa.gov)>; Rodman, Sonja <[Rodman.Sonja@epa.gov](mailto:Rodman.Sonja@epa.gov)>

**Cc:** Torres, Elineth <[Torres.Elineth@epa.gov](mailto:Torres.Elineth@epa.gov)>; Lamason, Bill <[Lamason.Bill@epa.gov](mailto:Lamason.Bill@epa.gov)>

**Subject:** RE: Current Version of Revision Memo

Rick,

# Ex. 5 - Attorney Client

# Ex. 5 - Attorney Client

Thank you everyone, Debra

**From:** Vetter, Rick  
**Sent:** Thursday, November 16, 2017 2:15 PM  
**To:** Dalcher, Debra <[dalcher.debra@epa.gov](mailto:dalcher.debra@epa.gov)>; McLamb, Marguerite <[McLamb.Marguerite@epa.gov](mailto:McLamb.Marguerite@epa.gov)>; Lamason, Bill <[Lamason.Bill@epa.gov](mailto:Lamason.Bill@epa.gov)>; Rodman, Sonja <[Rodman.Sonja@epa.gov](mailto:Rodman.Sonja@epa.gov)>  
**Cc:** Torres, Elineth <[Torres.Elineth@epa.gov](mailto:Torres.Elineth@epa.gov)>  
**Subject:** RE: Current Version of Revision Memo

# Ex. 5 - Attorney Client

Rick

Richard H. Vetter

Richard H. Vetter

Attorney Advisor

Air & Radiation Law Office

Office of General Counsel

[vetter.rick@epa.gov](mailto:vetter.rick@epa.gov)

919-541-2127

**From:** Dalcher, Debra

**Sent:** Thursday, November 16, 2017 1:40 PM  
**To:** Vetter, Rick <[Vetter.Rick@epa.gov](mailto:Vetter.Rick@epa.gov)>; McLamb, Marguerite <[McLamb.Marguerite@epa.gov](mailto:McLamb.Marguerite@epa.gov)>; Lamason, Bill <[Lamason.Bill@epa.gov](mailto:Lamason.Bill@epa.gov)>; Rodman, Sonja <[Rodman.Sonja@epa.gov](mailto:Rodman.Sonja@epa.gov)>  
**Cc:** Torres, Elineth <[Torres.Elineth@epa.gov](mailto:Torres.Elineth@epa.gov)>  
**Subject:** RE: Current Version of Revision Memo

Rick,

This is the current version.

Thank you, Debra

**From:** Vetter, Rick  
**Sent:** Thursday, November 16, 2017 1:30 PM  
**To:** Dalcher, Debra <[dalcher.debra@epa.gov](mailto:dalcher.debra@epa.gov)>; McLamb, Marguerite <[McLamb.Marguerite@epa.gov](mailto:McLamb.Marguerite@epa.gov)>; Lamason, Bill <[Lamason.Bill@epa.gov](mailto:Lamason.Bill@epa.gov)>; Rodman, Sonja <[Rodman.Sonja@epa.gov](mailto:Rodman.Sonja@epa.gov)>  
**Cc:** Torres, Elineth <[Torres.Elineth@epa.gov](mailto:Torres.Elineth@epa.gov)>  
**Subject:** RE: Current Version of Revision Memo

Debra,

## Ex. 5 - Attorney Client

Rick

Richard H. Vetter

Richard H. Vetter

Attorney Advisor

Air & Radiation Law Office

Office of General Counsel

[vetter.rick@epa.gov](mailto:vetter.rick@epa.gov)

919-541-2127

**From:** Dalcher, Debra

**Sent:** Monday, November 13, 2017 4:09 PM

**To:** McLamb, Marguerite <[McLamb.Marguerite@epa.gov](mailto:McLamb.Marguerite@epa.gov)>; Vetter, Rick <[Vetter.Rick@epa.gov](mailto:Vetter.Rick@epa.gov)>; Lamason, Bill <[Lamason.Bill@epa.gov](mailto:Lamason.Bill@epa.gov)>; Rodman, Sonja <[Rodman.Sonja@epa.gov](mailto:Rodman.Sonja@epa.gov)>

**Cc:** Dalcher, Debra <[dalcher.debra@epa.gov](mailto:dalcher.debra@epa.gov)>; Torres, Elineth <[Torres.Elineth@epa.gov](mailto:Torres.Elineth@epa.gov)>

**Subject:** Current Version of Revision Memo

**Importance:** High

As promised during our meeting this morning I am sending out the current working draft of the memo for your review/any comments.

Elineth and I will begin work on this again tomorrow. We would appreciate any feedback you might have on the attached.

Thank you, Debra

Debra S. Dalcher

U.S. EPA

Policy and Strategies Group

Sector Policies and Programs Division, OAQPS

109 T.W. Alexander Drive

Research Triangle Park, NC 27711

Phone: 919-541-2443